

<b>List of Commenters on the Proposed Second Five-Year Review Report: Individuals</b>			
<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
<b>Unique Letters (52-580)</b>			
52	Patricia	Aakre	7/24/17
53	Emm	Ache	8/30/17
54	Claudia	Ackerman	8/21/17
55	Jeff	Adams	9/1/17
56	Sam	Adels	8/14/17
57	Deborah	Adler	8/21/17
58	Joanna	Albertson	8/28/17
59	Tomara	Aldrich	9/1/17
60	Elizabeth	Allee	6/5/17
61	Richard	Allen	8/21/17
62	Suzanne	Allen	8/21/17
63	Roland	Alley	8/21/17
64	Thomas	Amisson	8/28/17
65	Mary	Andrews	9/1/17
66	Anonymous	Anonymous	7/25/17
67	Anonymous	Anonymous	8/21/17
68	Emi	Araki	8/29/17
69	Patricia	Arcuri	8/21/17
70	Al	Arioli	8/21/17
71	Dwight	Arthur	6/6/17
72	Tom	Artin	7/24/17
73	Judith	Asphar	8/24/17
74	Doris	Bachmann	9/1/17
75	Talya	Baharal-Gnida	8/21/17
76	Patrick	Bailey	8/21/17
77	Eric	Baker	8/21/17
78	Marni	Bakst	8/21/17
79	Kathryn	Barry	7/7/17
80	Scott	Basal	8/21/17
81	Susan	Basu	9/1/17
82	Bill	Bates	8/10/17
83	Cari	Bates	8/21/17
84	Alex	Beauchamp	8/29/17
85	Laurel	Becker	8/28/17
86	Andrew	Bell	8/29/17
87	Ros	Bell	8/21/17
88	Sandra	Bensalah	8/21/17
89	Lisa	Berry	8/21/17
90	Ryan	Blum	8/29/17
91	Cora	Bodkin	8/4/17
92	Betty	Boomer	7/26/17

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<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
93	Jon	Bowermaster	8/29/17
94	Danielle	Brecker	8/28/17
95	Nancy	Breen	8/21/17
96	Claire	Briguglio	8/9/17
97	Kristin	Brown	8/21/17
98	Helene	Browning	9/1/17
99	Ronda	Brunsting	7/28/17
100	John	Buckley	8/31/17
101	Tom	Buckner	6/16/17
102	Tom	Buckner	8/21/17
103	David	Budd	8/31/17
104	Ted	Burger	8/25/17
105	Jack	Burke	7/28/17
106	Linda	Burke	8/21/17
107	Sanford	Bush	8/31/17
108	Brenda	Campbell	8/21/17
109	Alyssa	Carbone	8/21/17
110	Valerie	Carlisle	7/5/17
111	Arthur	Carlucci	8/29/17
112	Miani	Carnevale	8/29/17
113	Jeremy	Carpenter	8/21/17
114	Jay	Cartagena	9/1/17
115	Brian	Caserto	8/21/17
116	Thomas	Cathcart	8/21/17
117	Dana	Chaifetz	5/30/17
118	Gwendolyn	Chambers	8/2/17
119	Martha	Cheo	6/17/17
120	Jeremy	Cherson	8/2/17
121	Jean	Chung	8/30/17
122	C.D.	Clark	7/19/17
123	Lawrence	Clarke	8/21/17
124	Blythe	Clark-McKittrick	8/31/17
125	Stephen	Cluskey	6/5/17
126	Nora	Cofresi	8/25/17
127	Nancy	Colas	8/29/17
128	Jon	Cole	8/25/17
129	Kelly	Collins	7/28/17
130	Daniel	Convissor	8/25/17
131	Jennifer	Convissor	8/28/17
132	James	Corcoran	8/29/17
133	Isabel	Cotarelo	8/21/17
134	Kyle	Cottier	8/29/17

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<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
135	Linda	Coupart	7/9/17
136	Michael and Reva	Cowan	9/1/17
137	Caroline	Craig	8/29/17
138	Patrick	Cunningham	7/28/17
139	Lawrence	Curtin	8/22/17
140	Nancy	Cutler	8/29/17
141	Caroline	Cutroneo	6/6/17
142	Peter	Cutul	9/1/17
143	Tara	D'Andrea	8/29/17
144	Roya	Darling	8/21/17
145	D	Darvie	7/28/17
146	George	Dashnaw	8/30/17
147	Eileen	de Munck	9/1/17
148	Margaret	Dean	8/21/17
149	Susan	Deane-Miller	8/21/17
150	Eva	Deitch	8/29/17
151	Darin	DeKoskie	6/28/17
152	Victoria	Delgado	7/25/17
153	OA	Dell	8/21/17
154	Alex	DeRosa	6/21/17
155	Jim	Desmond	8/24/17
156	Yvonne	Devlin	8/21/17
157	Frank & Joan	DiChiaro	8/22/17
158	Joanna	Dickey	9/1/17
159	Rita	Dixit-Bubiak	7/28/17
160	Jennifer	Dobson	8/22/17
161	Ron	Dombroski	6/10/17
162	Judy	Dong	9/1/17
163	Elke	D'Onofrio	9/1/17
164	Colleen	Dougherty	8/30/17
165	Ryan	Doyle	8/29/17
166	Jacquelyn	Drechsler	9/1/17
167	Jill	Dunay	8/21/17
168	Jake	Dunn	8/21/17
169	Rebecca	Dwyer	8/28/17
170	Jeff	Economy	8/30/17
171	Seth	Edelman	8/21/17
172	Jane	Ehrlich	8/29/17
173	Sarita	Eisenstark	8/21/17
174	Wallace	Elton	9/1/17
175	Katherine	Enberg	8/21/17
176	Cory	Ethridge	8/10/17

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<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
177	Mary	Evans	8/30/17
178	Russell	Faller	6/21/17
179	Russell	Faller	6/27/17
180	Russell	Faller	8/29/17
181	Armanda	Famiglietti	6/4/17
182	Peter	Farrell	8/21/17
183	Nina	Faver	8/21/17
184	Nancy	Felcetto	8/29/17
185	Roy	Felcetto	8/29/17
186	Deborah	Felder	8/29/17
187	Ricardo	Fernandez	8/22/17
188	Linda	Fernberg	8/25/17
189	Elvira	Ferrario	8/16/17
190	Mary	Fetherolf	8/21/17
191	Joe	Finan	8/30/17
192	Margaret	Finch	8/29/17
193	Rebecca	Finnell	8/30/17
194	John	Fisher	8/21/17
195	Lynn	Flanagan	7/19/17
196	Peter	Flanagan	9/1/17
197	Kristin	Flood	8/19/17
198	Patricia	Flood	8/21/17
199	Craig	Fogel	8/29/17
200	Bob, Marie	Foster	8/28/17
201	Marion	Foster	7/29/17
202	Tiffani	Francisco	8/29/17
203	Marcus	Frank	9/1/17
204	Florence Joan	Freeman	8/21/17
205	Linda; Chester	Freeman	8/18/17
206	Kate	Frizzell	8/25/17
207	Sharon	Gagne	8/21/17
208	Gail	Galitzine	8/29/17
209	Nancy	Gardner	8/21/17
210	Linda	Geary	8/21/17
211	Sheila	Geist	8/29/17
212	Sheila	Geist	8/30/17
213	Linda	Gerena	8/22/17
214	Ira	Gershenhorn	8/9/17
215	Jacquelyn	Gier	7/25/17
216	Steve	Gilman	6/2/17
217	Mary	Goddard	8/23/17
218	Nadine	Godwin	8/30/17

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<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
219	Steve	Gold	8/29/17
220	Patricia	Goldberg	8/22/17
221	Allan	Goldhammer	8/21/17
222	Freya	Goldstein	8/21/17
223	Karen	Goodman	6/6/17
224	Leslie	Gordon	7/25/17
225	Cindy	Gould	8/29/17
226	Nicole	Graf-Javery	8/23/17
227	Meryl	Greenblatt	8/22/17
228	Hannah	Greene	8/28/17
229	Rosalie	Griffith	8/22/17
230	Joan	Grishman	8/21/17
231	Daley	Gruen	8/29/17
232	Carol	Grunkemeyer	7/6/17
233	Robert	Grunkemeyer	7/6/17
234	Christine	Guarino	8/21/17
235	Michael	Gunderson	9/1/17
236	Mary	Gunter	8/21/17
237	Anne	Hager	8/28/17
238	Nancy	Hager	8/29/17
239	Christine	Hague	8/16/17
240	Emily	Hague	8/29/17
241	Paul	Hague	8/16/17
242	Brandon	Hakulin	8/21/17
243	Karen	Hall	8/21/17
244	Rhonni	Hallman	8/21/17
245	Mary	Hammett Stevenson	8/17/17
246	Martin	Hangarter	8/26/17
247	Terence	Hannigan	7/21/17
248	Beth	Hanson	8/31/17
249	Marc	Happet	9/1/17
250	Anne	Heaney	8/7/17
251	Anne	Heaney Johnson	8/17/17
252	Patricia	Heller	8/21/17
253	Irene	Herz	8/22/17
254	Jonathan	Herzog	9/1/17
255	Deborah	Highley	8/21/17
256	Annie	Hillay	7/25/17
257	Barbara	Hobens	8/21/17
258	Dana	Hoey	8/21/17
259	Miriam	Hoffman	8/4/17
260	Karin	Holloway	8/21/17

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<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
261	Timothy	Holmes	8/29/17
262	Wendy	Holtzman	8/18/17
263	Arlene	Holzman	7/19/17
264	Patrick	Hono	8/21/17
265	Joseph	Hope Jr.	8/21/17
266	Robin	Horowitz	8/29/17
267	Pat	Hughes	8/21/17
268	Carole	Hunt	8/22/17
269	David	Hupert	8/29/17
270	Ryan	Jafri	8/21/17
271	Ed	Jahn	8/26/17
272	Lee	Jamison	8/29/17
273	Lois	Janove	6/6/17
274	Susan	Johnson	8/22/17
275	Abigail	Jones	8/30/17
276	Justin	Jordak	8/21/17
277	Ellen	Jouret-Epstein	5/30/17
278	Christopher	Joy	9/1/17
279	Peter	Jung	8/4/17
280	Elissa	Jury	8/30/17
281	F. Michael	Kadish	7/11/17
282	Gloria	Kadish	8/7/17
283	Robert	Kalman	8/21/17
284	Sara	Kaminker	6/6/17
285	Carole	Kane	8/20/17
286	Edith	Kantrowitz	8/29/17
287	Edith	Kantrowitz	8/31/17
288	Nancy	Kaplan	8/29/17
289	Michelle	Karell	5/30/17
290	George	Katopis	8/21/17
291	Deb Peck	Kelleher	9/1/17
292	William	Kelleher	7/10/17
293	Laird	Kelly	8/16/17
294	Quinn	Kelly	8/21/17
295	Marci	Kenneda	8/24/17
296	John	King	8/21/17
297	Laurence	Kirby	8/21/17
298	Rachel	Kish	8/22/17
299	Cary	Kittner	8/21/17
300	Caroline	Klapproth	8/21/17
301	Amy	Kletter	8/29/17
302	Vladimir	Klimenko	8/30/17

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<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
303	Pete	Klosterman	8/29/17
304	J.	Knott	7/20/17
305	Wayne	Kocher	8/8/17
306	Susan	Koff	7/6/17
307	Laura	Kohlmann	8/22/17
308	Phil	Kovacs	8/21/17
309	Patricia	Kram	9/1/17
310	Pamela	Krimsky	8/28/17
311	Thomas	Kryzak	8/29/17
312	Peggy	Kurtz	8/22/17
313	A. Norman	Kvam	8/21/17
314	Marc	Lallanilla	8/31/17
315	Frank	Lancellotti	8/31/17
316	Barbara	Landa	7/25/17
317	Sasha	Langesfeld	7/25/17
318	Julie	Lappano	8/28/17
319	Michael	Laser	8/23/17
320	Judy	Lass	8/29/17
321	J. Eva	Lau	9/1/17
322	Robin	Laurita	8/22/17
323	Margaret	Leather	9/1/17
324	Patti	Lenseth	8/2/17
325	Jean	Leo	9/1/17
326	Esther	Light	9/1/17
327	David	Limburg	8/21/17
328	Hedvig	Lockwood	8/21/17
329	Elizabeth	LoGiudice	8/21/17
330	Skyler	Long	8/21/17
331	Albert and Doris	Lowenfels	8/29/17
332	Barbara	Lubell	8/21/17
333	David	Macaluso	8/25/17
334	Andrew	MacInnes	8/31/17
335	Edward	Mack	8/21/17
336	Cathy	Mackey	8/22/17
337	Molly	MacQueen	8/29/17
338	Sarah	MacWright	8/21/17
339	Kevin	Magee	8/21/17
340	Tom	Mahoney	8/30/17
341	Tom	Mahoney	8/30/17
342	Barry	Maisel	7/17/17
343	Pamela	Malcolm	8/21/17
344	Lucy	Manning	7/21/17

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<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
345	Mickey	Marcella	6/9/17
346	Jeffrey	Marino	8/31/17
347	Jeffrey	Marino	9/1/17
348	Kate	Marriott	8/21/17
349	Daniel	Marshall III	8/21/17
350	Matthew	Martini	8/29/17
351	Kara	Masciangelo	8/22/17
352	Kara	Masciangelo	8/22/17
353	Kara	Masciangelo	8/29/17
354	Kara	Masciangelo	8/30/17
355	Janice	Mastromarchi	8/31/17
356	David	Mathis	8/28/17
357	Debra	Mathis	8/29/17
358	Anne	McCabe	8/21/17
359	Christa	McCauley	8/21/17
360	Nora	McDowell	9/1/17
361	Willis	McEckron	6/14/17
362	Susan	McGrath	8/21/17
363	Virginia	McGreevy	7/31/17
364	Grant	McKeown	8/30/17
365	Merry	McLoryd	9/1/17
366	Jaime	McMillan	8/29/17
367	Patrick	McMullan	8/29/17
368	Christopher	McNally	8/24/17
369	David	McNally	8/21/17
370	Kathryn	McNamara	8/22/17
371	Francis	Metelski	8/21/17
372	Julie	Metz	8/21/17
373	Carol	Meyer	8/21/17
374	Robert	Michaels	8/30/17
375	Checko	Miller	8/21/17
376	Checko	Miller	9/1/17
377	Patricia	Miller	8/21/17
378	Scott	Miller	7/17/17
379	Katharine	Millonzi	8/29/17
380	Giles	Mitchell	8/25/17
381	Deidre	Moderacki	8/29/17
382	Julian	Moll-Rocek	7/25/17
383	Carol	Monteleoni	7/26/17
384	Philip and Carol	Monteleoni	7/26/17
385	Kimberly	Mooers	8/31/17
386	Kimberly	Mooers	8/31/17



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387	Sol	Mora	7/26/17
388	Teresa	Morelle	8/18/17
389	David	Mortimer	8/28/17
390	Eric	Munson	8/21/17
391	Maria	Muro	8/29/17
392	Jay	Murphy	8/31/17
393	Sean	Murray	8/31/17
394	Judy Gelman	Myers	8/16/17
395	Ani	Nappa	8/21/17
396	Jonathan	Nedbor	9/1/17
397	Patrick	Nelson	9/1/17
398	Mike	Newman	7/6/17
399	Grace	Nichols	8/21/17
400	Bob	Nirkind	8/25/17
401	William	Nixon	8/31/17
402	Jean	Noack	8/29/17
403	Wendy	Nodop	8/21/17
404	Erika	Nonken	8/29/17
405	Brian	Nowitski	8/29/17
406	Alexis	O'Brien	8/29/17
407	Kathryn	O'Brien	8/21/17
408	Annemarie	O'Connor	8/22/17
409	MaryAnna	O'Donnell	8/21/17
410	Rick	Oestrike	7/6/17
411	Margot	Olavarria	8/24/17
412	Victoria	Oltarsh	8/22/17
413	Victoria	Oltarsh	8/29/17
414	Kathryn	Ornstein	8/29/17
415	Eric	Ortner	8/22/17
416	Lauree	Ostrofsky	9/1/17
417	Margaret	Othrow	6/9/17
418	Carl	Otto	8/29/17
419	Craig D.	Palmer	8/25/17
420	John	Palmer	8/21/17
421	Julie	Parisi	8/21/17
422	Greg	Patch	8/21/17
423	Barbara	Paterson	8/21/17
424	Joy	Pell	9/1/17
425	Valerie	Percy	8/22/17
426	Katherine	Perino	8/29/17
427	Robert	Perretti	5/30/17
428	Robert	Perretti	8/16/17

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429	Robert	Perretti	8/16/17
430	Allison	Philpott	6/14/17
431	Kate	Phipps	8/29/17
432	Steven	Plotnick	7/13/17
433	Philip	Podmore	9/1/17
434	Rhonda	Pomerantz	8/22/17
435	Gail	Porter	5/30/17
436	Nicole	Porto	8/29/17
437	Sarah	Posner	8/29/17
438	Beth	Propper	8/29/17
439	Teri	Ptacek	9/1/17
440	Carmen	Pujols	6/27/17
441	Carmen	Pujols	6/28/17
442	Merrilyn	Pulver-Moulthrop	8/31/17
443	Patrick	Purcell	8/21/17
444	Ann	Quota	8/30/17
445	B	R	6/5/17
446	Amparo	Rally	8/30/17
447	Donald	Rally	8/30/17
448	Dorrit	Ram	8/16/17
449	Michael	Reed	7/25/17
450	James	Renner	8/31/17
451	Ryan	Reutershan	9/1/17
452	Heidi	Reyes	8/15/17
453	Michelle	Riddell	8/21/17
454	Michael	Riggio	8/29/17
455	Dennis	Riley	8/22/17
456	Andres	Rivera	8/29/17
457	David and Mary	Roberts	8/26/17
458	Timothy	Roberts	8/26/17
459	Clinton	Robinson	8/29/17
460	Matthew	Robinson	8/29/17
461	Jennifer	Roeder	8/29/17
462	Jessica	Roman	8/29/17
463	Christine	Root	9/1/17
464	Edith	Root	8/21/17
465	Bruce	Rosen	8/25/17
466	Martha	Roth	8/29/17
467	Matt	Rowan	7/20/17
468	Ann	Royston	9/1/17
469	Leah	Rubenstein	8/21/17
470	Franz	Safford	8/30/17

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471	Donald	Sagar	9/1/17
472	Patricia	Santiago	8/21/17
473	Jeffrey	Scales	8/29/17
474	Lisa	Scerbo	8/31/17
475	Karin	Scheele	7/25/17
476	Marilyn	Schiller	7/24/17
477	Marian	Schoettle	8/22/17
478	Roni	Schotter	8/30/17
479	Penny	Schoutn	8/21/17
480	Greg	Schultz	7/25/17
481	Phillip	Schwartz	8/21/17
482	Annie	Scibienski	8/21/17
483	Nancy	Sconza	8/21/17
484	Pat	Sexton	8/21/17
485	Eric	Shelfin	8/22/17
486	Laurel	Shute	8/31/17
487	Laurel	Shute	9/1/17
488	Claire	Siegel	7/28/17
489	Bena	Silber	9/1/17
490	Sherrill	Silver	7/26/17
491	Donna	Simms	8/21/17
492	Marianne	Siniopkin	8/25/17
493	Joanne	Sinovoi	8/29/17
494	Donald	Smith	8/22/17
495	Mark	Smith	8/21/17
496	Marie	Snyder	7/25/17
497	Sara	Sogut	8/21/17
498	Sara	Sogut	8/29/17
499	Jessica	Soloman	6/2/17
500	Leola	Specht	8/7/17
501	Leola	Specht	8/10/17
502	Paula	Speer	8/21/17
503	Judith	Stahl	8/31/17
504	Colin	Stair	8/29/17
505	Judy	Stanley	8/21/17
506	Alex	Stavis	8/21/17
507	Alex	Stavis	8/21/17
508	Maxina	Stearn	8/9/17
509	Stephanie	Stefanski	8/29/17
510	Joe	Stefko	8/16/17
511	Evelyn	Stein	8/29/17
512	Barbara	Stemke	6/28/17

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513	Fred	Stern	9/1/17
514	Marylou	Stern	8/22/17
515	Eric	Stiller	8/25/17
516	Julia	Stokes	8/31/17
517	Barbara	Sugin	8/29/17
518	Leonard	Sugin	8/29/17
519	Eileen	Sullivan	6/18/17
520	James	Sullivan	8/29/17
521	Marilyn	Sullivan	8/21/17
522	Christian	Sweningson	8/29/17
523	Nava	Tabak	8/30/17
524	Linda	Tafapolsky	8/21/17
525	Constance	Taft	8/21/17
526	Silvana	Tagliaferri	7/2/17
527	Jeff	Tanenbaum	8/9/17
528	Maria-Luisa	Tasayco	8/29/17
529	Annabel	Taylor	8/29/17
530	Marie	Taylor	9/1/17
531	Jaden	Thompson	7/25/17
532	Jack	Thorpe	8/21/17
533	Judith	Timke	7/26/17
534	Sarah	Todd	7/27/17
535	Nancy	Torchia	9/1/17
536	Vito	Trasmonte	9/1/17
537	Diane	Trieste	8/30/17
538	Barbara	Ungar	8/25/17
539	Michael	Vagnetti	8/25/17
540	Peter	Van Aken	8/21/17
541	Mark	Varian	8/29/17
542	Jessica	Vaughan	8/22/17
543	Jason	Velez	8/22/17
544	Harry	Vincent	8/25/17
545	Connie	Vixon	8/29/17
546	Tico	Vogtt	8/21/17
547	Leslie	Von Pless	8/23/17
548	Dorothy	Wadsworth	8/21/17
549	Jennifer	Walford	8/25/17
550	Alison	Waller	7/21/17
551	Emily	Waller	7/27/17
552	Bella	Wang	8/28/17
553	Kathleen	Wanser	8/29/17
554	Laura	Ward	8/22/17

<b>List of Commenters on the Proposed Second Five-Year Review Report: Individuals</b>			
<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
555	Robyn	Waters	8/29/17
556	Noah	Watts	7/25/17
557	Russell	Wege	7/25/17
558	Laura	Weiland	7/25/17
559	Gerald	Wein	9/1/17
560	Mark	Weinstein	8/21/17
561	Harvey	Weiss	9/1/17
562	Tierney	Weymueller	8/21/17
563	Cindy	Wian	8/28/17
564	Jared	Widjeskog	8/21/17
565	Trisha	Wild	8/23/17
566	Courtney M.	Williams	8/25/17
567	Jason	Williams	8/21/17
568	Autumn	Williams-Wussow	8/21/17
569	Geniene	Wilson	8/21/17
570	Sally	Wilson	7/19/17
571	Sarah	Wilson	7/20/17
572	Tania	Wolf	8/30/17
573	Bill	Wolfsthal	8/31/17
574	Doug	Wygat	8/29/17
575	Elizabeth	Yalkut	6/12/17
576	Erin	Yarrobino	8/23/17
577	Kathleen	Young	8/21/17
578	Brook	Zelcer	8/30/17
579	John	Zimmerman	7/20/17
580	Juliette		7/25/17
<b>Additional Letters* (581-1968)</b>			
581	Patricia	Aakre	8/25/17
582	Betty	AbajianSeaman	8/21/17
583	Gabriel	Abate	8/29/17
584	August	Abel	8/19/17
585	Katherine	Abel	8/29/17
586	Steven	Abel	8/25/17
587	Olya	Abezgauz	8/21/17
588	Olya	Abezguaz	8/22/17
589	Doug	Abramson	8/21/17
590	Mary	Abrey	8/22/17
591	Bobbie	Adams	8/29/17
592	Sean	Adams	8/18/17
593	Jana	Adler	8/26/17
594	Joan	Agro	8/24/17
595	Grace	Aiello	8/29/17

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<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
596	Sonja	Aiken	8/22/17
597	Pascal	Akesson	8/29/17
598	Donald	Albrecht	8/30/17
599	Diane	Alden	8/24/17
600	Rick	Alfandre	8/21/17
601	Jill	Alibrandi	8/26/17
602	Gail	Allan	8/29/17
603	Jeannette	Allan	8/24/17
604	David	Allen	8/30/17
605	Kendra	Allenby	9/1/17
606	Ivanya	Alpert	8/29/17
607	Steven	Altarescu	9/1/17
608	Karen	Ambrosetti	8/21/17
609	Martin	Amsel	8/24/17
610	Amy	Anderson	8/29/17
611	Emily	Anderson	8/30/17
612	Katherine	Anderson	8/29/17
613	Tracy	Anderson	8/29/17
614	Nancy	Andreassi	8/29/17
615	Audrey	Ang	8/28/17
616	Paul	Annetts	8/24/17
617	Lisa	Arbisser	9/1/17
618	Mercedes	Armillas	8/29/17
619	Lindsey	Arnell	8/30/17
620	K	Arnone	8/7/17
621	Barbara	Aronowitz	8/24/17
622	Eric	Arroyo	8/29/17
623	Karen	Asher	8/21/17
624	Jude	Asphar	8/29/17
625	Bianca	Assim-Kon	8/18/17
626	Alexis	Audette	8/24/17
627	Carol	Auer	8/22/17
628	Melisa	Auf der Maur	8/31/17
629	Brian	Austin	8/29/17
630	Sharon	AvRutick	8/22/17
631	S	B	8/24/17
632	Katherine	Babiak	8/30/17
633	Jesse	Bachir	8/29/17
634	Frances	Backofen	8/21/17
635	Marta	Baez	8/29/17
636	Cari	Bailey	8/21/17
637	Melissa	Bailey	8/22/17

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<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
638	Jeffrey	Bains	8/29/17
639	P	Baker	8/16/17
640	Candace	Balmer	8/30/17
641	Janice	Banks	8/29/17
642	Peter	Bannon	8/29/17
643	Daniel	Barclay	8/29/17
644	Alan	Bare	8/24/17
645	John	Barone	8/21/17
646	Enzo	Barrios	8/30/17
647	Marina	Barry	8/29/17
648	Carolyn	Bartholomew	8/24/17
649	Olga	Bartnicki	8/29/17
650	Cat	Basciano	8/16/17
651	Mark	Bastian	9/1/17
652	William	Battaglia	8/30/17
653	Pamela	Battle	8/30/17
654	Deborah	Bauer	8/30/17
655	Joan-Marie	Bauman	8/24/17
656	Deborah	Baumann	8/29/17
657	John	Bauza	8/21/17
658	Susan	Baxter	8/24/17
659	Bonnie	Bayardi	8/25/17
660	Linda	Beach	8/24/17
661	Carol	Bean	8/22/17
662	Elisabeth	Bechmann	8/29/17
663	Juan	Bedoya	8/22/17
664	Stephan	Beffre	8/26/17
665	Bertram	Beissel	8/29/17
666	Stephen	Bellomo	8/30/17
667	David	Bennett	8/29/17
668	Frances	Berger	8/22/17
669	Stephanie	Berger	9/1/17
670	Deborah	Bergman	8/28/17
671	Jill	Berliner	8/7/17
672	Janice	Bernard	8/29/17
673	Jean	Bernard	8/22/17
674	Bonnie	Bernstein	8/29/17
675	Lesley	Bernstein	8/22/17
676	Lisa	Berrol	8/22/17
677	Lisa	Berry	8/30/17
678	Joseph	Bertolozzi	8/22/17
679	Karyn	Bevet	8/22/17

**List of Commenters on the Proposed Second Five-Year Review Report: Individuals**

<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
680	Bob	Bickford	9/1/17
681	Annie	Bien	8/18/17
682	Alex	Billig	8/21/17
683	Gene	Binder	8/21/17
684	Janet	Binion	8/21/17
685	Janet	Binion	8/29/17
686	Richard	Binkele	8/22/17
687	Beth	Birnbaum	8/24/17
688	Jacqueline	Birnbaum	8/7/17
689	Maureen	Black	8/25/17
690	Sandy	Black-McDonough	8/29/17
691	Jeremiah	Blatz	8/25/17
692	Ashley	Blazer	8/29/17
693	Brandon	Block	8/17/17
694	Corliss	Block	8/25/17
695	Josephine	Bloodgood	8/21/17
696	Donald	Bluestone	9/1/17
697	Richard	Bodane	8/24/17
698	Dwight	Bodycott	8/18/17
699	Pauline	Boehm	8/10/17
700	Hollis	Bogdanffy	8/21/17
701	Gusti	Bogok	8/19/17
702	David	Bogoslaw	8/29/17
703	Gabrielle	Bordwin	8/29/17
704	Jim	Botta	8/24/17
705	Garrison	Botts	8/29/17
706	KJ	Bowen	8/30/17
707	Grace	Bowne	8/24/17
708	Mary Alice	Boyle	8/22/17
709	Mary Alice	Boyle	8/22/17
710	Diane E.	Bradley	8/25/17
711	Kathleen	Brady	8/30/17
712	Ira	Brandenburg	8/23/17
713	Peter	Brandt	8/7/17
714	Nancy	Breen	8/22/17
715	Sophie	Breitbart	8/22/17
716	Lise	Brenner	8/29/17
717	Patricia	Brescia-Cantine	8/29/17
718	Frank	Brice	8/21/17
719	John	Brinkman	8/24/17
720	Anna	Bristow	8/30/17
721	Undine	Brod	8/30/17



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<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
722	Kathleen	Brodbeck	9/1/17
723	Marinus	Broekman	8/24/17
724	Alan	Brown	8/29/17
725	Babette	Brown	8/7/17
726	Denise	Brown	8/29/17
727	Janelle	Brown	8/25/17
728	Elizabeth	Bruen	8/22/17
729	Deborah	Brunner	8/22/17
730	Nancy	Bruno	8/29/17
731	Jan	Buchalter	8/8/17
732	Anne Marie	Bucher	8/24/17
733	Joseph	Buchheit	8/11/17
734	Teresa	Buchholz	8/29/17
735	Karin	Bucklin	8/29/17
736	Catherine	Budd	8/22/17
737	Katie	Bull	8/29/17
738	Diane	Burke	8/29/17
739	Sue	Burke	8/22/17
740	Kit	Burke-Smith	8/22/17
741	Margaret	Burton	8/31/17
742	Elena	Busani	8/24/17
743	Edward	Butler	8/29/17
744	Susan	Butterfass	8/22/17
745	Joyce	Byrne	8/21/17
746	Suzanne	Cachon	8/30/17
747	Peter	Callaway	8/29/17
748	R	Cammisa	8/25/17
749	Dac	Campbell	8/30/17
750	Patti	Candelari	8/29/17
751	Irwin	Cantos	8/22/17
752	Michelle	Capuano	8/22/17
753	Patricia	Cardello	8/30/17
754	Patricia	Cardoso	8/24/17
755	Rachel	Careau	9/1/17
756	Elisa	Caref	8/21/17
757	Kathy	Carey	9/1/17
758	Patsy	Carl	8/30/17
759	Nancy	Carmichael	8/22/17
760	Christy	Carosella	8/29/17
761	Katelyn	Carroll	8/22/17
762	Matthew	Carroll	8/21/17
763	Teri-Ann	Carryl	8/30/17

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<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
764	Matthew	Carson	8/22/17
765	Carmen	Casado	8/30/17
766	Jose Chicaiza	Casado	8/30/17
767	Lynn	Cascio	8/29/17
768	Allan	Casement	8/29/17
769	Leslie	Cassidy	8/29/17
770	Elizabeth	Castaldo	8/29/17
771	Dorinda	Cataldo	8/24/17
772	Armanda	Catenaro	8/25/17
773	Mikki	Chalker	8/24/17
774	Michael	Chameides	9/1/17
775	Henry	Charles	8/29/17
776	Phylicia	Chartier	8/3/17
777	Lisa	Chason	8/31/17
778	Myrel	Chernick	8/30/17
779	Elaine	Cherry	8/30/17
780	Russell	Chiappa	8/29/17
781	Evelyn	Chiarito	8/29/17
782	Evonne	Cho	8/22/17
783	Kelly	Choi	8/30/17
784	Doris	Chorny	8/31/17
785	Peggy	Christian	8/30/17
786	Bob	Christianson	8/24/17
787	Stephanie	Christoff	8/20/17
788	Lauren	Ciborski	8/31/17
789	Monique	Clague	8/29/17
790	Lawrence	Clarke	8/29/17
791	Meryl	Classen	8/29/17
792	Anne Katherine	Cleary	8/22/17
793	Susan	Clelland	8/29/17
794	Geralyn	Clemens	8/31/17
795	Jesse	Clinton	8/29/17
796	Joseph	Cloidt	8/29/17
797	Laura-Christina	Cobb	8/17/17
798	Claudia	Cockerill	8/22/17
799	Florence	Cohen	8/29/17
800	Wendi	Cohen	8/29/17
801	Herbert	Coles	8/29/17
802	Bonnie	Collins	8/25/17
803	Thomas	Comiskey	8/7/17
804	David	Condon	8/29/17
805	Patricia	Connolly	8/24/17

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<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
806	Douglas	Cooke	8/29/17
807	James	Cooper	8/29/17
808	Adam	Cooperstock	8/24/17
809	Ryan	Coraldi	8/22/17
810	Marion	Corbin	8/22/17
811	Marion	Corbin	8/22/17
812	Marion	Corbin	8/29/17
813	Phyllis	Corcacas	8/29/17
814	Jared	Cornelia	8/29/17
815	Sean	Cortright	8/22/17
816	Victoria	Costello	8/22/17
817	Fiona	Cousins	8/17/17
818	Sherrill	Cox	8/25/17
819	Susan	Cox	8/7/17
820	Laurrie	Cozza	8/29/17
821	Marcelle	Crago	8/30/17
822	Joy	Cranker	8/22/17
823	Fran	Crilley	8/25/17
824	Al	Cruz	9/1/17
825	Helen	Cu	8/29/17
826	Ann Marie	Cunningham	8/29/17
827	Benjamin	Curran	8/23/17
828	Annalise	Curtin	8/29/17
829	Whitefeather	Curtiss	8/22/17
830	Caroline	Cutroneo	8/21/17
831	Clarissa	Cylich	8/21/17
832	Jane	Cyphers	8/16/17
833	Julie	Dahl	8/21/17
834	Marge	Dakouzlian	8/25/17
835	Jordan	Dale	8/30/17
836	Susan	Damato	8/19/17
837	Donna	Dangelo	8/22/17
838	Beth	Darlington	8/7/17
839	Kate	Darringo	8/18/17
840	Nina	David	8/24/17
841		Davis	8/28/17
842	Juanita	Dawson-Rhodes	8/29/17
843	Carol	De Angelo	8/24/17
844	C	de Ben	8/18/17
845	Noel	De La Cruz	8/25/17
846	Gerald	Dean	8/23/17
847	Nita	DeBono	8/19/17

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<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
848	Diane	DeChillo	9/1/17
849	Theresa	DeGraw	8/25/17
850	Julia	Dehn	9/1/17
851	Charles	Del Regno	8/23/17
852	Charlie	Del Regno	9/1/17
853	Arthur	Delaney	8/20/17
854	Robert	DeLay	8/30/17
855	Peter	DeLorenzo	8/29/17
856	Sheila	Dempsey	8/7/17
857	Laura	deNey	8/29/17
858	Daryl	Denning	8/24/17
859	Donna	Denny	8/30/17
860	Margaret	DeRose	8/30/17
861	Mark	Dery	8/21/17
862	Roberta	Desalle	8/29/17
863	Claudia	Devinney	8/7/17
864	Sterling	DeWeese	8/22/17
865	Harris	Diamant	9/1/17
866	Josh	Diamond	9/1/17
867	Rosalind	Dickinson	8/29/17
868	Tara	DiDonna	8/22/17
869	David	Dienes	8/29/17
870	James	DiMunno	8/18/17
871	Jacalyn	Dinhofer	8/29/17
872	NoÃ©	Dinnerstein	8/30/17
873	Doreen	Diorio	8/30/17
874	Vincent	DiTizio	8/30/17
875	Barbara	DiTommaso	8/19/17
876	James	Doherty	8/25/17
877	Adam	Dominiak	8/18/17
878	Ann	Donohue	8/29/17
879	Elaine	Donovan	8/7/17
880	Chris	Doolittle	8/22/17
881	David	Douglas	8/29/17
882	Susan	Downes	8/21/17
883	Taylor	Doyle	8/21/17
884	Muriel	Doyne	8/18/17
885	Christine	Drosky	8/22/17
886	Bette	Druck	8/16/17
887	Chris	Drumright	8/29/17
888	Brian	Duea	8/29/17
889	Diane	Duffus	8/25/17

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890	Brian	Duffy	8/23/17
891	John	Dugan	8/22/17
892	John	Dugan	9/1/17
893	Timothy	Dunn	8/29/17
894	Bernadette	Duquette	8/22/17
895	Janet	Duran	8/30/17
896	Gregory	Durniak	8/29/17
897	Virginia	Dwyer	8/29/17
898	Emily	Eckart	8/21/17
899	Choral	Eddie	8/21/17
900	Alisa	Eilenberg	8/7/17
901	Esmee	Einerson	8/29/17
902	Josh	Eisenstark	8/24/17
903	Liz	Elkin	8/29/17
904	Jan	Emerson	8/29/17
905	Anne	Endler	8/7/17
906	Anna	Engdahl	8/29/17
907	D.	E-Platt	8/21/17
908	Lori	Epstein	9/1/17
909	Susan	Epstein	9/1/17
910	Alessia	Eramo	8/29/17
911	Jessica	Ettinger	8/30/17
912	Alicia	Everett	8/30/17
913	Jennifer	Fahey	8/25/17
914	Judy	Fairless	8/29/17
915	Eugene	Falik	8/12/17
916	Russell	Faller	8/8/17
917	Dan	Famer	8/21/17
918	Stacey	Farber	8/21/17
919	Raymond	Farrington	8/29/17
920	Tami Lin	Farrow	8/29/17
921	Mary	Fasano	8/22/17
922	Wendy	Fast	8/30/17
923	Mary Ann	Fastook	8/29/17
924	Pat	Faye	8/21/17
925	Kristina	Fedorov	8/25/17
926	Arnold	Feinsilber	8/30/17
927	Dianne	Felix	8/25/17
928	Ellen	Fenton	8/31/17
929	Roxanne	Ferber	8/25/17
930	Yvette	Fernandez	8/30/17
931	Andrew	Fetherolf	8/25/17

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<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
932	Ariel	Feuz	8/25/17
933	Jon	Fields	8/29/17
934	Francisco	Figueirido	8/30/17
935	Cristina	Fiorillo	8/29/17
936	Chrissy	Fischetti	8/22/17
937	Mel	Fish	8/22/17
938	Norman	Fisher	8/22/17
939	Kaitlin	Fitch	8/7/17
940	Julia	Fitzgerald	8/29/17
941	Mike	Fitzgerald	8/21/17
942	Barbara	Fitzhugh	8/31/17
943	Barbara	Fitzhugh	9/1/17
944	Ellen	Fleishman	8/24/17
945	Diana	Flood	8/22/17
946	Patricia	Flood	8/22/17
947	Patricia	Flood	8/25/17
948	Patricia	Flood	8/29/17
949	Patricia	Flood	8/29/17
950	Patricia	Flood	8/30/17
951	Bobbie	Flowers	8/24/17
952	Jillian	Flynn	8/17/17
953	Thomas	Folkl	8/25/17
954	J.R.	Fontaine-Serra	8/29/17
955	Maureen	Ford	8/29/17
956	Tanya	Foret	8/21/17
957	Janet	Forman	8/18/17
958	Laura	Forman	8/21/17
959	Devlin	Foster	8/30/17
960	Ian	Fountain	8/21/17
961	Ian	Fountain	9/1/17
962	Steven	Fowler	8/21/17
963	Andrea	Frank	8/29/17
964	Elaine	Frankle	8/30/17
965	Brian	Frederick	8/24/17
966	Misha	Fredericks	9/1/17
967	Heather	Free	8/6/17
968	Ava	Freeman	8/30/17
969	Ronald	Friedman	8/24/17
970	Justin	Fromm	8/16/17
971	L.	Fron	8/29/17
972	Romain	Fruge	8/28/17
973	Mark	Frusciante	8/22/17

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<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
974	Carrie	Fudge	8/30/17
975	Jane	Fuller	9/1/17
976	Roy	Fuller	8/24/17
977	Dorian	Fulvio	8/29/17
978	Lee	Furbeck	9/1/17
979	Victoria	Furio	8/29/17
980	Rob	Fursich	8/7/17
981	Deborah	Fusco, RMT	8/22/17
982	Maria	Gagliardi	8/30/17
983	Bernard	Galiley	8/29/17
984	Barbara	Galli	8/22/17
985	Dianne	Galliher	8/29/17
986	Angel	Garcia	8/18/17
987	Cari and Donald	Gardner	8/7/17
988	Joy	Garland	8/18/17
989	Ktie	Garton	8/29/17
990	Nathan	Gauthier	8/29/17
991	John	Gebhards	8/24/17
992	Sharon	Gelfand	8/22/17
993	Sharon	Gelfand	8/22/17
994	Michael	Gelfer	8/7/17
995	Derek	Gendvil	8/29/17
996	Donna	George	8/29/17
997	Thomas	George	8/29/17
998	Paul	Ghenoiu	8/22/17
999	Helen	Ghiradella	8/24/17
1000	Mary	Gianetto	8/22/17
1001	Mary	Gianetto	8/22/17
1002	Anthony	Giannantonio	8/22/17
1003	Laurette	Giardino	8/22/17
1004	Thomas	Giblin	8/18/17
1005	Ward	Giblin	8/18/17
1006	David	Gilbert	8/22/17
1007	Nina	Gimmel	8/30/17
1008	Mark	Ginsburg	8/30/17
1009	Clarice	Glandon	8/29/17
1010	Toni	Glikes	8/21/17
1011	Matthew	Glock	8/22/17
1012	Matthew	Glock	8/30/17
1013	Rise	Gluck	8/29/17
1014	Alexander	Goasdoue	8/7/17
1015	Susan	Goldfarb	8/21/17

<b>List of Commenters on the Proposed Second Five-Year Review Report: Individuals</b>			
<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
1016	Allan	Goldstein	8/21/17
1017	Howard	Goldstein	8/29/17
1018	Mary	Goldstein	8/22/17
1019	Louise	Golub	8/29/17
1020	Ronaldo	Gonzalez	8/22/17
1021	Mike	Good	8/30/17
1022	Karine	Gordineer	8/25/17
1023	David	Gordon	8/27/17
1024	Emily	Gordon	8/28/17
1025	Nancy	Gordon	9/1/17
1026	Richard	Gordon	8/29/17
1027	Sarah	Gordon	8/30/17
1028	Cyd	Gorman	9/1/17
1029	Deborah	Gorman	8/29/17
1030	Mark	Gorsetman	8/19/17
1031	Laura	Grady	8/25/17
1032	Jacqueline	Grand Pre	8/30/17
1033	George	Graney	8/21/17
1034	D	Green	8/31/17
1035	Jeff	Greenberg	8/29/17
1036	Karen	Greenspan	8/29/17
1037	Daria	Gregg	8/8/17
1038	Sophie	Greller	8/29/17
1039	Homer Ellis	Griffin	8/29/17
1040	Lucy	Grimes	8/29/17
1041	Tracy	Griswold	8/7/17
1042	Andrew	Grod	8/21/17
1043	John	Gromada	8/31/17
1044	Martin	Gromulat	8/7/17
1045	Sabina	Gross	8/18/17
1046	Yonni	Groza	8/23/17
1047	Gina	Guarino	8/22/17
1048	Richard	Guier	8/29/17
1049	James	Guilianelli	8/22/17
1050	James	Guilianelli	8/29/17
1051	Paula	Gullo	8/23/17
1052	Rachel	Gumina	8/24/17
1053	Karlene	Gunter	8/9/17
1054	Marina	Gutierrez	8/21/17
1055	Zinnia	Gutowski	8/29/17
1056	Dominique	ha	8/17/17
1057	Connie	Haack	8/21/17



**List of Commenters on the Proposed Second Five-Year Review Report: Individuals**

<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
1058	Jeffrey	Haas	8/23/17
1059	Renee	Hack	8/24/17
1060	Renee	Hack	8/30/17
1061	Heather	Haggerty	8/22/17
1062	Brandon	Hakulin	8/21/17
1063	Peter	Halewood	8/28/17
1064	Brett	Hall	8/22/17
1065	Margaret	Halliday	8/25/17
1066	Hagit	Halperin	8/29/17
1067	Jane	Halsey	8/29/17
1068	Colleen	Hamilton	8/18/17
1069	John	Hamilton	8/25/17
1070	Michele	Hamilton	9/1/17
1071	Sarah	Hamilton	8/7/17
1072	Susan	Hamilton	8/2/17
1073	Mary Lynn	Hanley	8/29/17
1074	Terence and Norma	Hannigan	8/22/17
1075	Rosalie	Harman	8/16/17
1076	Elizabeth	Harrington	8/23/17
1077	Emmalia	Harrington	8/16/17
1078	Elaine	Hartel	8/29/17
1079	Joyce	Hartsfield	8/22/17
1080	Christine	Harvey	8/18/17
1081	David	Harvey	8/22/17
1082	Bjorn	Harvold	8/17/17
1083	Tracey	Hastings-Ward	9/1/17
1084	Martin	Hauser	8/30/17
1085	Jill	Hausman	8/29/17
1086	Kathy	Haverkamp	8/29/17
1087	Gerry	Hawkins	8/22/17
1088	Sheryl & Don	Haynie/Samuel	8/24/17
1089	Mary	Hays	8/28/17
1090	Chris	Hazynski	8/24/17
1091	William	Healey	8/7/17
1092	Thomas	Hearty	8/24/17
1093	Josh	Heffron	8/24/17
1094	Eli	Hegeman	8/19/17
1095	Adriana	Heguy	8/16/17
1096	Michael	Heimbinder	8/29/17
1097	Jenny	Heinz	8/24/17
1098	Mary	Heller	8/29/17
1099	Laurie	Henderson	8/22/17

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<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
1100	-	Hera	8/29/17
1101	Jan	Herndon	8/18/17
1102	Carol	Herring	9/1/17
1103	Marianne	Herrmann	8/22/17
1104	Nava	Herzog	8/25/17
1105	Brenda	Hewett	8/31/17
1106	Pat	Hickey	8/25/17
1107	Brian	Higbie	8/25/17
1108	Jeanne	Hobert	9/1/17
1109	Mark	Hockman	8/18/17
1110	Matthew	Hoff	9/1/17
1111	Deborah	Hoffman	8/25/17
1112	Randi	Hoffmann	8/29/17
1113	Paul	Hofheins	8/18/17
1114	Constance	Hoguet Neel	8/24/17
1115	Hussein	Hollan	8/25/17
1116	Susan	Holland	9/1/17
1117	Tamsin	Hollo	8/22/17
1118	John	Holodak	8/29/17
1119	F	Holz	8/29/17
1120	J	Holz	8/29/17
1121	Teresa	Hommel	8/29/17
1122	Natalia	Hook	8/21/17
1123	Stephen	Hopkins	8/17/17
1124	Jennifer	Horowitz	8/19/17
1125	Lily	Hou	8/29/17
1126	Jennifer	Houston	9/1/17
1127	Paticia	Houston	8/24/17
1128	Claire	Howard	8/24/17
1129	Nina	Howes	8/21/17
1130	Vicki	Huber	8/29/17
1131	Christina	Hubrt	8/22/17
1132	Jerold	Huebner	8/23/17
1133	Marc	Humphrey	8/30/17
1134	Obie	Hunt	8/16/17
1135	Heather	Hurley	8/30/17
1136	June	Hurst	8/29/17
1137	Noelene	Hutchinson	8/25/17
1138	A	I	8/29/17
1139	Hatti	Iles	8/29/17
1140	Cora	Impenna	8/22/17
1141	Daniel	Incristo	8/3/17

<b>List of Commenters on the Proposed Second Five-Year Review Report: Individuals</b>			
<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
1142	Margaret	Innerfoher	8/7/17
1143	Adam	Isler	8/29/17
1144	Susan	Italia	8/31/17
1145	Lisa	Izes	8/30/17
1146	Sandy	J	8/29/17
1147	B.L.	Jacobi	8/22/17
1148	Carol	Jagiello	8/29/17
1149	Chip	James	8/21/17
1150	Chip	James	8/30/17
1151	Jared	Jamesson	8/29/17
1152	Shahla	Jannetta	8/31/17
1153	Alan	Jasper	8/29/17
1154	Payont	Jatasanont	8/29/17
1155	Lynne	Jeanette	8/30/17
1156	Barbara	Jesrani	8/30/17
1157	Angela	Johnsom	8/23/17
1158	Carla Rae	Johnson	8/28/17
1159	Kathy	Johnson	8/21/17
1160	Margaret	Johnson	9/1/17
1161	Theresa	Johnson	8/24/17
1162	David	Johnston	9/1/17
1163	Nathaniel	Johnston	8/22/17
1164	Blanche	Jones	8/22/17
1165	Marjorie	Jones	8/22/17
1166	Robert	Jones	8/19/17
1167	Walter	Jones	9/1/17
1168	Barbara	Joslyn	8/29/17
1169	Adrian	Juarez	8/30/17
1170	Carol	Jurczewski	8/29/17
1171	Elaine	Jurumbo	8/29/17
1172	Deedra	Kaake	8/22/17
1173	Marilyn	Kaggen	8/24/17
1174	Lyle	Kahn	8/29/17
1175	Sabrina	Kahn	8/12/17
1176	Paul	Kalka	9/1/17
1177	Jean	Kallina	8/22/17
1178	Edith	Kantrowitz	8/31/17
1179	Sandra	Kaplan	8/29/17
1180	Sylvia	Kaplan	8/29/17
1181	Joe	Karr	8/24/17
1182	Beth	Kashmann	8/25/17
1183	Sheri	Kastner	9/1/17

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<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
1184	Lora	Katen	8/29/17
1185	Nikki	Katsikas	8/28/17
1186	Alayne	Katz	8/30/17
1187	Stacy	Katz	8/21/17
1188	Annie	Katzman	8/29/17
1189	Andreas	Kaubish	8/7/17
1190	Alix	Keast	8/24/17
1191	John	Keiser	8/24/17
1192	Peter	Keiser	8/19/17
1193	Charles	Keller	8/24/17
1194	Matthew	Kelly	8/29/17
1195	Vincent	Kelly-Brownell	8/29/17
1196	Jane	Kendall	8/30/17
1197	Meredith	Kent-Berman	8/19/17
1198	Maria	Keramari	8/22/17
1199	David	Kern	8/24/17
1200	Ethan	Kerr	8/23/17
1201	Lisa	Ketchum	8/25/17
1202	JK	Kibler	8/29/17
1203	Johanna	Kiernan	8/30/17
1204	Joh	Killen	8/22/17
1205	Kevin	Kilner	8/29/17
1206	Donald	Kimmel	8/25/17
1207	D.	King	9/1/17
1208	David	King	8/26/17
1209	Julie Parisi	Kirby	8/7/17
1210	Lori	Kirsch	9/1/17
1211	Leonard	Kirsch III	8/21/17
1212	Leonard	Kirsch III	8/22/17
1213	Leonard	Kirsch III	8/22/17
1214	Leonard	Kirsch III	8/25/17
1215	Leonard	Kirsch, III	9/1/17
1216	Sandra	Kissam	8/24/17
1217	Eresha	Kissoon-Fareed	8/22/17
1218	Timothy	Kleeger	8/30/17
1219	Amy	Kletter	8/29/17
1220	David	Klinke	8/7/17
1221	Ulrike	Klopfner	8/24/17
1222	Claudine	Klose	9/1/17
1223	Nina	Knanishu	8/19/17
1224	Brian	Knowles	8/31/17
1225	Michael	Kodransky	8/30/17

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1226	Laura	Koestler	8/29/17
1227	Laura	Kohlmann	8/22/17
1228	Alon	Koppel	9/1/17
1229	Ray	Koretsky	8/30/17
1230	George	Kormendi	8/29/17
1231	Ellen	Korz	8/27/17
1232	Ellen	Kozak	8/30/17
1233	JAMES	Kozlik	8/22/17
1234	Lori	Krane	8/29/17
1235	Steven	Krauss	8/21/17
1236	Jennifer	Krawitz	8/11/17
1237	Pam	Kray Gallivan	8/18/17
1238	Elena	Krumova	8/29/17
1239	Richard	Krupp	8/25/17
1240	Walter	Kuciej	8/29/17
1241	William	Kuehnling	8/18/17
1242	Elyse	Kunz	8/30/17
1243	Pat	Kush	8/24/17
1244	Toren	Kutnick	8/18/17
1245	Katie	Kynast	8/29/17
1246	John	Lacey	8/21/17
1247	Dimitri	Laddis	8/28/17
1248	Dennis	Ladner	8/31/17
1249	Annik	LaFarge	8/30/17
1250	Terri	Laidman	8/22/17
1251	Andrew	Laiosa	8/29/17
1252	Marion	Lakatos	8/29/17
1253	Catherine	Lala	8/22/17
1254	Katrina	Lalonde	8/22/17
1255	Tara	Lambert	8/28/17
1256	Wendy	Lambert	8/22/17
1257	William	Landau	8/22/17
1258	Hilary	Lander	8/22/17
1259	Michelle	Lange	8/30/17
1260	Norbert	Langer	8/29/17
1261	Hatti	Langsford	8/30/17
1262	Bianca	Lanza	8/30/17
1263	Bianca	Lanza	9/1/17
1264	Ricky	Lark	8/22/17
1265	Nancy	Larsen	8/22/17
1266	Carol	Latourette	9/1/17
1267	Lynn	Lauber	8/21/17

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<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
1268	Julianna	Lavin	9/1/17
1269	Linda	Lavin	8/22/17
1270	Susan	Lawrence	8/22/17
1271	Michael	Lebron	8/22/17
1272	Jo-Ann	Lechner	8/19/17
1273	Benjamin	Lee	8/29/17
1274	Deborah K.	Lee	8/29/17
1275	Diane	Lee	8/30/17
1276	Michel	Lee	8/29/17
1277	Steven	Lee	8/31/17
1278	Steven	Lee	9/1/17
1279	Arthur	Leibowitz	8/7/17
1280	Hannah	Leider	8/29/17
1281	Doug	Leihbacher	8/22/17
1282	Jill	Lein	8/30/17
1283	B. R.	Lemonik	8/24/17
1284	Bernice	Lenahan	8/4/17
1285	Eileen	Lennon	8/21/17
1286	Wayne	Lensu	8/7/17
1287	Gale	Leonard	8/25/17
1288	Gerson	Lesser	8/29/17
1289	Kathleen	Letchford	8/29/17
1290	Rhonda	Levine	8/7/17
1291	Ellen	Levinson	8/21/17
1292	Jeffrey	Levitt	8/18/17
1293	David	Levy	8/21/17
1294	Erma	Lewis	8/29/17
1295	Erma	Lewis	8/29/17
1296	Mike	Lieber	8/22/17
1297	D. M.	Linkie	8/25/17
1298	Matthew	Liponis	8/31/17
1299	Danette	Lipten	8/22/17
1300	Jennifer	Lischak	8/25/17
1301	Jim	Littlefield	8/29/17
1302	Elaine	Livingston	8/24/17
1303	Patricia	Livingston	8/30/17
1304	Patricia	Livingston	9/1/17
1305	Rich	Locicero	8/22/17
1306	Diane	Lombardi	8/22/17
1307	Diane	Lombardi	8/22/17
1308	Catherine	Lombardo	8/30/17
1309	Robert	Long	8/22/17

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<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
1310	Scott	Longstreet	8/21/17
1311	Mary	Loomba	8/29/17
1312	Michael	Loos	8/29/17
1313	Nancy	Lopez	8/24/17
1314	Christopher	Lord	8/19/17
1315	Mark	Lotito	8/27/17
1316	Evan	Loughran	8/10/17
1317	Hilarie	Louis	8/24/17
1318	Joe	Lowenbraun	8/23/17
1319	Alison	Lucek	8/30/17
1320	Nicole	Luciani	8/29/17
1321	Rachel	Lugo	8/23/17
1322	Brian	Luman	8/24/17
1323	Martin	Lupowitz	8/25/17
1324	Susan	Lupul	8/22/17
1325	Barbara	Lynch	8/24/17
1326	Lois	Lynn	8/18/17
1327	Clarinda	Mac Low	8/29/17
1328	Stephen	Mac Nish	8/29/17
1329	Marissa	Macagnone	8/22/17
1330	Michael	Macelhiney	8/29/17
1331	Christine	Maciel	8/22/17
1332	Robert	Mackey	8/29/17
1333	Michael	Madden	8/7/17
1334	Robert	Madorran	8/30/17
1335	Laraine	Mai	8/21/17
1336	Karyn	Maier	8/30/17
1337	Linda	Maldonado	8/24/17
1338	Matthew	Malina	8/29/17
1339	Kenneth	Malkin	8/21/17
1340	Athena	Malloy	8/18/17
1341	Mitch	Maloof	8/24/17
1342	Danielle	Maltby	8/22/17
1343	Lindsay	Mandel	8/28/17
1344	Michael	Mangino	8/22/17
1345	Alexandra	Manning	8/29/17
1346	Clint	Marallo	8/24/17
1347	Marlena	Marallo	8/2/17
1348	Jack David	Marcus	8/17/17
1349	Jack David	Marcus	8/22/17
1350	Kimberly	Marcus	8/29/17
1351	Karlene	Maresco	8/22/17

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1352	Jordan	Margolis	8/23/17
1353	Kathy	Margulis	8/29/17
1354	Phillip	Marinelli	8/29/17
1355	Jane	Marinsky	8/21/17
1356	Darian	Mark	8/29/17
1357	Emily	Maroney	8/29/17
1358	Debbie	Marotta	8/22/17
1359	Jim	Marrinan	8/30/17
1360	Laurence	Martin	8/22/17
1361	Rea	Martin	8/30/17
1362	Tina	Martin	8/29/17
1363	Isabel	Martins	8/18/17
1364	Joan	Martorano	8/22/17
1365	Toby	Marxuach-Gusciora	8/29/17
1366	Kara	Masciangelo	8/28/17
1367	Ben	Mastaitis	8/24/17
1368	Angela	Mastracchio	8/21/17
1369	Frances	Mastrota	8/7/17
1370	Dennis	Mathews	8/29/17
1371	Larissa	Matthews	8/18/17
1372	Elizabeth	Maucher	8/29/17
1373	Hope	Mauran	8/29/17
1374	Kurt	Mausert	8/21/17
1375	George Louis	Mayer	8/29/17
1376	Francis	Mayle	8/29/17
1377	Kathleen	Mazza	8/21/17
1378	Linda	McArdle	8/30/17
1379	Diane	McAteer	8/29/17
1380	Paul	McCarthy	8/28/17
1381	Richard	McCauley	8/24/17
1382	Flannery	McDermott	8/25/17
1383	John	McDonald	8/29/17
1384	Roland	McDonald	8/24/17
1385	Mary	McGeary	8/7/17
1386	Chris	McGinn	8/29/17
1387	Emma	McGregor-Mento	8/16/17
1388	Steven	McIntyre	8/30/17
1389	Grant	McKeown	8/28/17
1390	Mary	Mckeown	8/22/17
1391	Alan	McKnight	8/7/17
1392	Brian	McLaughlin	8/29/17
1393	Kathleen	McLaughlin	8/24/17



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1394	Elizabeth	McMahon	8/7/17
1395	Jennifer	McMorrow	8/25/17
1396	Jennifer	McMorrow	8/29/17
1397	Susan	McNamara	8/17/17
1398	William	McNamara	9/1/17
1399	Monica	McQuade	8/25/17
1400	Robert	McQuilkin Jr.	8/22/17
1401	Joanna	Meakin	8/25/17
1402	Tatiana	Mejia	8/19/17
1403	Dominic	Melita	8/29/17
1404	Donna	Menconeri	9/1/17
1405	Rik	Mercaldi	8/21/17
1406	Jonathan	Mernit	8/21/17
1407	Andrew	Meyer	8/22/17
1408	Laurie	Miccio	8/25/17
1409	Bonnie	Michaels	8/22/17
1410	Sharon	Michales	8/24/17
1411	Ragnar	Midtskogen	8/21/17
1412	Lyndsey	Milcarek	8/20/17
1413	Joanne	Miller	8/29/17
1414	John	Miller	8/5/17
1415	Jonathan	Miller	8/16/17
1416	Marjorie	Miller	8/24/17
1417	Matthew	Miller	8/22/17
1418	Alvin	Miller Jr	8/25/17
1419	Alvin	Miller Jr	8/30/17
1420	Alvin	Miller Jr	9/1/17
1421	Alvin	Miller Jr.	8/22/17
1422	Judy	Miller-Lyons	9/1/17
1423	Jackie	Mills	8/29/17
1424	Laura	Milsom	8/22/17
1425	Harut	Minasian	8/31/17
1426	Hayley	Mink	8/29/17
1427	Ellen	Miret	8/22/17
1428	Lily	Mleczko	8/29/17
1429	Alexis	Mohr	8/30/17
1430	Phyllis	Mollen	8/24/17
1431	Barbara	Moloney	8/21/17
1432	Barbara	Moloney	8/22/17
1433	Jesse	Monahan	8/21/17
1434	Joanne	Moncada	8/29/17
1435	Gail	Moore	8/29/17

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1436	Robert	Moore	8/24/17
1437	Thomas	Moore	8/29/17
1438	Anne	Mor	8/22/17
1439	Sylvia	Morais	8/22/17
1440	Will	Morel	8/29/17
1441	Teresa	Morelle	8/18/17
1442	Dennis	Morley	8/29/17
1443	Lewis	Morrison	8/19/17
1444	Janet	Moser	8/24/17
1445	Chelsea	Mozen	8/7/17
1446	Norine	Muhfeld	8/10/17
1447	James	Mulder	8/29/17
1448	Ellen	Mulkerin	8/22/17
1449	Mary	Mullaney	8/22/17
1450	Monuca	Mulligen	8/29/17
1451	Dory	Munder	8/30/17
1452	Laura	Munisteri	8/22/17
1453	Eric	Munkelt	8/30/17
1454	Eric	Munkelt	9/1/17
1455	Maki	Murakami	8/29/17
1456	Lizzie	Murchison	8/29/17
1457	Susan	Murphy	8/21/17
1458	Susan	Murphy	8/29/17
1459	Dara	Murray	8/29/17
1460	William	Murtha	8/29/17
1461	Michael	Musante	8/23/17
1462	Roger	Muzii	8/29/17
1463	Lindsey	Muzzio	8/29/17
1464	Carol	Myers	8/24/17
1465	Emma	Myers	8/31/17
1466	Laura	Myerson	8/24/17
1467	Sandra	Naidich	8/18/17
1468	S.	Nam	8/18/17
1469	Courtney	Nandagiri	8/24/17
1470	Jean	Naples	8/7/17
1471	P.	Naprstek	8/31/17
1472	Gretchen	Nau	8/22/17
1473	Rosemary	Neer	8/21/17
1474	Lisa	Neste	8/29/17
1475	Eric	Neuman	8/21/17
1476	Lynn	Neuman	8/29/17
1477	Ted	Neumann	9/1/17

**List of Commenters on the Proposed Second Five-Year Review Report: Individuals**

<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
1478	John	Neumeister	8/21/17
1479	John	Neumeister	9/1/17
1480	Bob	Nevelus	8/30/17
1481	Roxie	Newberry	8/30/17
1482	Antonella	Nielsen	8/29/17
1483	Anthony	Nigro	8/29/17
1484	Carla	Ninos	8/28/17
1485	Sajendra	Nithiananthan	8/29/17
1486	Joseph	Nitzberg	9/1/17
1487	Mary	Noll	8/24/17
1488	Lauren	Noonan	8/21/17
1489	Terry	Nord	8/22/17
1490	Mary Ann	Nordheimer	8/29/17
1491	Ilana	Novick	8/29/17
1492	Laura	Nowack	8/28/17
1493	Natalie	Nussbaum	8/29/17
1494	Kathy	Oconnor	8/28/17
1495	Mary Beth	OConnor	8/29/17
1496	Patricia	Odell	8/29/17
1497	Cynthia	Ofer	8/29/17
1498	Kerry	O'Flynn	9/1/17
1499	Barb	OFriel	9/1/17
1500	Elizabeth	O'Hara	8/29/17
1501	William	O'Hearn	8/29/17
1502	Luis	Olavarria	9/1/17
1503	Margot	Olavarria	8/16/17
1504	Kevin	Oldham	8/19/17
1505	Joseph	Olejak	8/23/17
1506	Victoria	Oltarsh	8/25/17
1507	Carole	Osterink	8/30/17
1508	Linde	Ostro	8/25/17
1509	Joseph	O'Sullivan	8/21/17
1510	Tara	O'Sullivan	9/1/17
1511	Jane	Osuna	9/1/17
1512	Marge	Othrow	8/24/17
1513	Maxwell	Owen	8/30/17
1514	Michael	Owen	8/29/17
1515	Roseanne	Pacheco	8/22/17
1516	Linda	Pachter	8/29/17
1517	Sarah	Page	9/1/17
1518	Harela	Paglia	8/21/17
1519	Vic	Paglia	8/7/17

<b>List of Commenters on the Proposed Second Five-Year Review Report: Individuals</b>			
<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
1520	Carol	Painter	8/21/17
1521	Laura	Pakaln	8/22/17
1522	Tami	Palacky	8/29/17
1523	Anne	Palagano	8/22/17
1524	Craig	Palmer	8/29/17
1525	Julie	Palmeri	8/22/17
1526	Charlie	Pane	9/1/17
1527	Drew	Panko	8/24/17
1528	Laura	Pantazis	8/29/17
1529	John	Papandrea	8/24/17
1530	Joan	Paris	8/21/17
1531	Pat	Pascual	8/18/17
1532	Michael	Pastore	9/1/17
1533	Jacob	Patenaude	8/22/17
1534	Randolph	Patrick	9/1/17
1535	Ernest	Paviour	8/18/17
1536	Anrea	Payne	9/1/17
1537	Gail	Payne	8/24/17
1538	Jennifer	Paynter	8/21/17
1539	Barbara	Pearson	8/7/17
1540	Pippa	Pearthree	8/29/17
1541	Robert	Pease	8/21/17
1542	Mary	Peck	8/30/17
1543	Melanie	Pedicini	8/7/17
1544	Annadora	Pedro	8/22/17
1545	Susan	Pelosi	8/30/17
1546	Vickiana	Pena	8/28/17
1547	Eliane	Pereira	8/24/17
1548	Martha	Perlmutter	8/18/17
1549	Richard	Perras	8/18/17
1550	Robert	Perretti	8/7/17
1551	Tony	Perrottet	8/17/17
1552	Debbie	Peters	8/29/17
1553	Laura	Petit	8/22/17
1554	Joe	Pfister	8/18/17
1555	Gaelene	Phelps	8/29/17
1556	Gaelene	Phelps	9/1/17
1557	Trent	Philipp	8/24/17
1558	Brother Robert	Pierson OHC	8/22/17
1559	Jon	Pike	8/30/17
1560	Thomas	Pintagro	8/29/17
1561	Debra	Plishka	8/29/17

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<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
1562	Jane	Podell	8/22/17
1563	Albert	Poland	8/25/17
1564	Jack	Polonka	8/18/17
1565	Marian	Pompa	8/31/17
1566	Charles	Pompey	8/22/17
1567	Tyler	Poniatowski	8/29/17
1568	Bernadette	Powis	8/29/17
1569	Diane	Praus	8/19/17
1570	Ralph	Preiss	8/21/17
1571	Spencer	Prevallet	8/13/17
1572	Elysee	Price	8/29/17
1573	Lou	Priem	8/19/17
1574	Richard	Procida	8/24/17
1575	Camala	Projansky	8/25/17
1576	Clifford	Provost	8/8/17
1577	Lise	Prown	8/24/17
1578	Nicholas	Prychodko	8/24/17
1579	David	Prystal	8/29/17
1580	Laurie	Puca	8/27/17
1581	Katy	Purtee	9/1/17
1582	Katheryn	Quick	8/21/17
1583	Diane	Quinn	8/21/17
1584	Edythe Ann	Quinn	8/29/17
1585	Mary	Quinn	8/29/17
1586	Joseph	Quirk	8/28/17
1587	Laura	Rabinow	8/23/17
1588	Tracy	Raczek	8/8/17
1589	Mary	Rader	8/31/17
1590	Joann	Ramos	8/7/17
1591	Hale	Randers-Pehrson	8/20/17
1592	Edward	Rashba	8/22/17
1593	Andrew	RatZin	9/1/17
1594	Marie	Rayho	8/30/17
1595	Jeff	Reagan	8/22/17
1596	Lobi	RedHaw	8/29/17
1597	Joyce	Reeves	8/29/17
1598	Lenore	Reeves	8/29/17
1599	Pam	Rehm	8/29/17
1600	Cynthia	Reichman	8/29/17
1601	Michael	Reichman	8/29/17
1602	Mary	Reilly	8/21/17
1603	John	Reimnitz	8/31/17

<b>List of Commenters on the Proposed Second Five-Year Review Report: Individuals</b>			
<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
1604	Josephine	Reina	8/22/17
1605	Edward	Rengers	8/29/17
1606	Beth	Renner	8/29/17
1607	Beth	Renner	8/30/17
1608	Beth	Rennig	8/30/17
1609	Athena	Resch	8/23/17
1610	Haleigh	Reutershan	8/22/17
1611	Cathy	Revis	8/7/17
1612	Cathy	Revis	8/22/17
1613	Annia	Reyes	8/23/17
1614	Adelaide	Reynolds	8/29/17
1615	Thomas	Reynolds	8/24/17
1616	Robert	Rice	8/16/17
1617	Frederich	Rich	8/25/17
1618	Amanda	Richards	8/24/17
1619	Kathleen	Richardson	8/7/17
1620	Diana	Riddle	8/29/17
1621	George	Riggs	8/24/17
1622	James	Riley	8/29/17
1623	Kelly	Riley	8/29/17
1624	Dianne	Rinaldi	8/31/17
1625	Melissa	Rinzler	8/29/17
1626	Diane	Rios	8/30/17
1627	Elaine	Risch	8/22/17
1628	Barbara	Riso	9/1/17
1629	Javier	Rivera	8/24/17
1630	Renee	Rizzo	8/18/17
1631	Krystal	Roach	8/27/17
1632	Chuck	Roberts	8/29/17
1633	Cynthia	Roberts	8/22/17
1634	Marcia	Robinson	8/18/17
1635	Robert	Robinson	8/30/17
1636	Iris	Rochkind	8/19/17
1637	Zachary	Rodgers	8/22/17
1638	Heriberto	Rodriguez	9/1/17
1639	Sylvia	Rodriguez	8/16/17
1640	Lily	Rodulfo	8/22/17
1641	Robert	Rogers	8/24/17
1642	Johanna	Rose	9/1/17
1643	Stephen	Rose	8/24/17
1644	Chris	Rosen	8/29/17
1645	Jenny	Rosenthal	8/23/17

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<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
1646	Robert	Rosenthal	8/18/17
1647	Suzie	Ross	8/21/17
1648	Timothy	Rosser	8/7/17
1649	Janice	Rossi	8/24/17
1650	Jodie	Rossi	8/22/17
1651	Livia	Rossi	8/30/17
1652	Janice	Rost	8/29/17
1653	Janice Arlene	Rost	8/22/17
1654	Rochelle	Rothbaum	8/23/17
1655	Margery	Rothenberg	8/22/17
1656	Christina	Rousseau	8/29/17
1657	Wileen	Rowley	9/1/17
1658	Rebecca	Roy	8/30/17
1659	Jonathan	Rubin	8/19/17
1660	Paul	Rubin	8/16/17
1661	Karen	Rubino	8/29/17
1662	Helena	Rudd	8/16/17
1663	Rosalee	Ruediger	8/21/17
1664	Vincent	Rusch	8/29/17
1665	Mike, Pat	Ruscigno, Hilliard	8/31/17
1666	Paul	Russell	8/21/17
1667	Samantha	Russo	8/20/17
1668	Seth	Rutman	8/19/17
1669	Megan	Ryan	8/29/17
1670	Elaine	Sacco	9/1/17
1671	Marysa	Sacerdote	8/30/17
1672	Emma Lou	Sailors	8/24/17
1673	Diana	Salsberg	8/28/17
1674	Laurie	Salzberg	8/31/17
1675	Ahide	Sanchez	8/31/17
1676	Dominick	Santise	8/29/17
1677	Mary	Sari	8/29/17
1678	Carolyn	Sas	9/1/17
1679	Daniel	Savatteri	8/30/17
1680	Jason Douglas	Saville	8/22/17
1681	Marietta	Scaltrito	8/24/17
1682	Chris	Scanga	8/28/17
1683	Christopher	Scanga	9/1/17
1684	Kelley	Scanlon	8/24/17
1685	Martin	Schabu	8/20/17
1686	Wendy	Scheir	8/29/17
1687	Joan	Schildwachter	8/29/17

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<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
1688	Elaine	Schindler	8/21/17
1689	Pierre	Schlemel	8/24/17
1690	Erica	Schmidt	8/29/17
1691	Naomi	Schmidt	8/30/17
1692	Chris	Schneebeili	8/29/17
1693	Shirley	Schue	8/29/17
1694	Marthe	Schulwolf	8/22/17
1695	Phillip	Schwartz	8/30/17
1696	Sybil	Schwartzbach	9/1/17
1697	Sabine	Schwarz	8/29/17
1698	Thomas	Scialo	8/7/17
1699	Carina	Scorcia	8/29/17
1700	Amanda	Scott	8/22/17
1701	P.	Scoville	8/7/17
1702	Margaret	Scripp	8/29/17
1703	Shelley	Seccombe	8/31/17
1704	Michael	Seckendorf	8/29/17
1705	Laura	Seitz	8/31/17
1706	Kim	Sellon	8/14/17
1707	Richard	Sena	8/29/17
1708	Yoshihiro	Sergel	8/29/17
1709	Donna	Serpentini	8/30/17
1710	Linda	Sewell	8/7/17
1711	Susan	Shaak	8/21/17
1712	Karen	Shalom	8/22/17
1713	Barbara	Shapiro (Raskopf)	8/29/17
1714	William	Sharfman	8/7/17
1715	William	Sharfman	8/25/17
1716	Janis	Sharkey	9/1/17
1717	Gary	Shaw	8/23/17
1718	Clare	Sheridan	8/21/17
1719	Ian	Sheridan	8/29/17
1720	Samantha	Sherry	8/28/17
1721	Kate	Sherwood	8/24/17
1722	Alice	Shields	8/7/17
1723	Susan	Shockett	8/23/17
1724	Beth	Shortsleeves	8/29/17
1725	Lisa	Shumate	8/19/17
1726	Elizabeth	Shundi	8/22/17
1727	Susan	Sie	8/30/17
1728	Ana	Sierra	8/18/17
1729	Ethan	Signer	8/18/17



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<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
1730	Jeffrey	Silman	8/29/17
1731	Jill	Silverman	8/30/17
1732	Laura	Silverman	8/24/17
1733	Sasha	Silverstein	8/29/17
1734	Virginia	Simek	8/22/17
1735	Beatrice	Simmonds	8/3/17
1736	Eileen	Simon	8/22/17
1737	Norman	Sissman	8/29/17
1738	John	Skelly	8/23/17
1739	Caren	Skibell	8/29/17
1740	Darren	Skotnes	8/29/17
1741	Katherine	Slawinski	8/27/17
1742	Jessica	Smith	8/23/17
1743	Kevin	Smith	8/21/17
1744	Mary	Smith	8/7/17
1745	Melinda	Smith	8/20/17
1746	Vanessa	Smith	8/27/17
1747	Addie	Smock	8/7/17
1748	Virginia	Snider	8/29/17
1749	Elena	Snyder	9/1/17
1750	Sandy	Sobanski	8/24/17
1751	Gillian	Sobocinski	8/27/17
1752	Sabrina	Solomon	8/29/17
1753	David	Sorensen	8/7/17
1754	Nicolai	Soriano	9/1/17
1755	Cynthia	Soroka-Dunn	8/30/17
1756	Deniseadenise	Sossa	8/30/17
1757	Rebecca	Soule	8/29/17
1758	Trevor	Southlea	8/31/17
1759	Harvey	Spears	8/7/17
1760	Leola	Specht	8/7/17
1761	Elaine	Sperbeck	8/29/17
1762	Vanessa	Spiegel	8/30/17
1763	Barry	Spielvogel	8/24/17
1764	Abby	Spitzer	8/21/17
1765	Abby	Spitzer	8/28/17
1766	Stuart	Spolin	8/21/17
1767	Rebekkah	Sprague	8/30/17
1768	Ann	Sprayregan	8/29/17
1769	Judy	St. Hedley	8/24/17
1770	Jane	Stabile	8/21/17
1771	Shannon	Stagman	8/28/17

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<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
1772	Anna	Stahlie	8/30/17
1773	Carol	Stamets	8/29/17
1774	Judyth	Stavans	8/30/17
1775	Alex	Stavis	8/16/17
1776	Jean	StClair	8/22/17
1777	Jean	StClair	8/22/17
1778	Fern	Stearney	8/22/17
1779	Doug	Steckler	8/19/17
1780	Deborah	Stedge	9/1/17
1781	Joanne	Steele	8/29/17
1782	Dylan	Stein	8/21/17
1783	Herbert	Stein	8/19/17
1784	Herbert	Stein	8/24/17
1785	Jane	Stein	8/24/17
1786	Lorenz	Steininger	8/29/17
1787	Richard	Stern	8/18/17
1788	Susan	Stevens	9/1/17
1789	Paige	Stevenson	8/22/17
1790	Heather	Stewart	8/28/17
1791	Michael	Stocker	8/7/17
1792	Jill	Stolt	8/22/17
1793	Claudia	Stoltman	9/1/17
1794	Marcia	Stone	8/29/17
1795	Peggy	Stork	8/22/17
1796	Laurie	Storm	8/29/17
1797	James	Strickler	8/23/17
1798	Caroline	Stupple	8/30/17
1799	Moraima	Suarez	8/29/17
1800	Josh	Subin	8/30/17
1801	Anna	Sullivan	8/21/17
1802	Terry	Sullivan	8/29/17
1803	Karen	Sussan	8/30/17
1804	Judith	Swallow	8/22/17
1805	Tami	Swartz	8/29/17
1806	Kathleen	Sweeney	8/28/17
1807	Leslie	Sweeney	8/29/17
1808	Glynis	Sweeny	9/1/17
1809	Alexandra	Sweeton	8/28/17
1810	Michael	Szeto	8/29/17
1811	Sandy	Tabin	8/30/17
1812	Susan	Tabor	8/31/17
1813	Christen	Tallas	9/1/17

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<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
1814	Gail	Tauber	8/28/17
1815	Abigail	Taylor	8/30/17
1816	Jason	Taylor	9/1/17
1817	Nancy	Taylor	8/30/17
1818	Margaret	Teahan	8/7/17
1819	Gary	Telfer	8/21/17
1820	Michele	Temple	8/7/17
1821	Edith	Templeton	8/29/17
1822	Hannah	Tennant-Moore	8/21/17
1823	Lynne	Teplin	8/18/17
1824	Ron	Tergesen	8/29/17
1825	Rashida	Tewarson	8/22/17
1826	Deborah	Thackrey	8/22/17
1827	Robert	Thibault	8/24/17
1828	Irene	Thiel	8/24/17
1829	Tracy	Thomas	8/22/17
1830	Lorraine	Thompson	9/1/17
1831	James	Thoubboron III	8/25/17
1832	Robert	Tipp	8/30/17
1833	Jo	Toland	8/29/17
1834	Elizabeth	Tolliver	8/22/17
1835	Lynn	Tondrick	8/29/17
1836	Susan	Torres	8/18/17
1837	Joan	Traber	8/22/17
1838	Joanne	Trapanese	8/22/17
1839	Nancy	Traverse	8/22/17
1840	Thomas	Trengove	8/29/17
1841	Adam	Trese	8/30/17
1842	Mary	Troland	8/29/17
1843	Ryan	Trow	8/30/17
1844	Ann	Troxler	8/29/17
1845	Barbara	Trypaluk	8/29/17
1846	Ling	Tsou	8/16/17
1847	Ling	Tsou	8/21/17
1848	Leigh Ann	Tulleson	8/30/17
1849	Alexander	Turkenich	8/29/17
1850	Charity	Turner	8/22/17
1851	Deborah	Turner	8/30/17
1852	Sean A.	Twohig	8/29/17
1853	Francine	Tyler	8/29/17
1854	Joel	Tyner	9/1/17
1855	Kathy	Upham	8/22/17

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<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
1856	Chris	Usami	8/20/17
1857	Nick	Vailakis	9/1/17
1858	Fernando	Valentin	8/14/17
1859	Matthew	Van Brocklin	8/21/17
1860	Brent	Van Dyke	8/30/17
1861	Marcsha	Vander Heyden	8/16/17
1862	Theresa	Vanyo	8/22/17
1863	Patrick	Varekamp	8/24/17
1864	Alexandra	Vargo	9/1/17
1865	Anna	Varney	8/20/17
1866	Joseph M	Varon	8/29/17
1867	Francisco J.	Velez	8/25/17
1868	Joanna	Venditto	8/21/17
1869	Maria	Venidis	8/18/17
1870	Robert	Veralli	8/24/17
1871	David	Verhoff	8/25/17
1872	David	Verhoff	8/28/17
1873	Margaret	Vernon	8/24/17
1874	Paolo	Vidali	8/19/17
1875	Nicole	Vidor	8/30/17
1876	Lauren	Vigna	8/29/17
1877	Harry	Vincent	8/22/17
1878	Richard	Vincent	9/1/17
1879	Jerald	Vinikoff	8/18/17
1880	Andy	Von Salis	8/18/17
1881	Helen	Vose	8/29/17
1882	Carla	Waldron	8/19/17
1883	Ruth	Walker	8/22/17
1884	Steven	Walker	8/29/17
1885	Robert	Waller	8/29/17
1886	Brad	Walrod	8/29/17
1887	Gerald	Walsh	8/18/17
1888	Ruth	Walter	8/21/17
1889	Wendy	Walters	8/24/17
1890	Jonathan	Wang	8/31/17
1891	Eddie	Ward	8/9/17
1892	Ken	Ward	8/19/17
1893	Marc	Ward	8/24/17
1894	Paula	Ward	8/30/17
1895	Bob	Warren	8/22/17
1896	Carol	Warren	8/29/17
1897	Edward	Warren	8/21/17

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<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
1898	Dina	Wasserman	8/21/17
1899	Marc	Waters	8/19/17
1900	Eli	Watts	8/18/17
1901	Michael	Watts	9/1/17
1902	Noah	Watts	8/23/17
1903	Clifford	Weathers	8/23/17
1904	Esther	Weaver	8/24/17
1905	Melissa	Weaver	9/1/17
1906	Marie	Webster	8/25/17
1907	Marie	Webster	8/28/17
1908	Annie	Wei	8/30/17
1909	Carmen	Wei	8/18/17
1910	Penelope	Weinberg	8/22/17
1911	Adam	Weinert	8/22/17
1912	Adam	Weinert	8/22/17
1913	Florence	Weintraub	8/15/17
1914	Elaine	Weir	8/18/17
1915	Stana	Weisburd	8/30/17
1916	Marcia	Weiss	8/22/17
1917	Alicia	Weissman	8/21/17
1918	Shaye	Wel	8/21/17
1919	William	Welkowitz	8/29/17
1920	Heather	Wells	8/23/17
1921	Molly	Westbrook	8/30/17
1922	Patrick	Whalen	8/29/17
1923	Ian	Wheeler	8/29/17
1924	Mona	White	8/29/17
1925	Penny	White	8/24/17
1926	Edward B.	Whitney	8/25/17
1927	Wheelock	Whitney	8/25/17
1928	Teena	Wildman	8/29/17
1929	Kimberly	Wiley	8/24/17
1930	Michael	Wiley	8/31/17
1931	Seth	Wiley	8/30/17
1932	Andrea	Williams	8/29/17
1933	Andrew	Williams	8/24/17
1934	Suzanne	Williams	8/22/17
1935	Nathanel	Williams Jr.	8/29/17
1936	Thomas	Windberg	8/29/17
1937	Dana	Winkler	8/30/17
1938	Amy	Winter	8/24/17
1939	Marsha	Wiseltier	8/18/17

<b>List of Commenters on the Proposed Second Five-Year Review Report: Individuals</b>			
<b>EPA Index Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Date Submitted</b>
1940	Ron	Wish	8/24/17
1941	Frederick	Wishner	8/29/17
1942	Andrew and Kathleen	Wittenborn	8/29/17
1943	Ellen	Wolfe	8/7/17
1944	Peter	Wood	8/29/17
1945	Rick	Wood	8/29/17
1946	Veronica	Wood	8/29/17
1947	Sarah	Woodard	8/18/17
1948	Richard	Wright	8/22/17
1949	Richard	Wright	8/29/17
1950	Richard	Wrobel	8/21/17
1951	Yishin	Yang	9/1/17
1952	Donna	Yannazzone	8/22/17
1953	Emma	Young	8/21/17
1954	Jean	Young	8/29/17
1955	Kathy	Young	8/30/17
1956	Kristina	Younger	8/29/17
1957	J	Yuzawa	8/24/17
1958	Phyllis	Zahnd	8/7/17
1959	Susan	Zeiger	8/29/17
1960	Brook	Zelcer	9/1/17
1961	Janet	Zies	9/1/17
1962	Andrea	Zinn	8/29/17
1963	Pamela	Zino	8/30/17
1964	James	Zorn	8/22/17
1965	Carlo	Zucchi	8/29/17
1966	Cordelia	Zukerman	8/21/17
1967	Anonymous		8/18/17
1968	Anonymous		8/18/17

\* Two letters were submitted by a number of individuals. The individual commenters are listed below, and one example of each letter is provided in this pdf. All submittals were reviewed by the EPA.

# Hudson River clean up of PCBs

Patricia Aakre [REDACTED] >

Mon 7/24/2017 9:40 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>; info@riverkeeper.org <info@riverkeeper.org>; pruit.scott@epa.gov <pruit.scott@epa.gov>; Jerrold Nadler <Jerrold.Nadler@mail.house.gov>;

As a long time resident of New York City, and someone who has lived in New York State her whole life, I am concerned that the Hudson River remains polluted by PCBs as a result of General Electric's dumping these chemicals into the river. Even though the Trump administration may not agree with everything that environmentalists say or do, it is the law we have in place that needs to be enforced. It is more important to protect the health of our citizens than to ensure the wealth of large companies. GE needs to be held accountable for the complete cleanup of the river, not just some of it.

I will be watching carefully to be sure that our superfund mission to clean up the Hudson from decades of pollution is carried out.

Sincerely,

Patricia M. Aakre

[REDACTED]

# EPA Second Draft Year Review

Emm Ache [REDACTED]

Wed 8/30/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am a current resident of Saugerties, NY which lies on the Hudson River. My family and I have been fishing and boating on the Hudson for generations. [REDACTED] the Rondout creek which flows into the Hudson River.

It is a true shame that the people of the Hudson Valley cannot safely consume the fish provided by their main waterway. Our river has been contaminated by none other than a billion dollar corporation. PCB's are known carcinogen to people and our river is flooded with them.

I wrote a paper in college regarding the health of the Hudson River and the dredging project. There were high hopes from many that our river would be cleaned by those who poisoned it (General Electric) .

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Emm Ache  
[REDACTED]  
[REDACTED]  
[REDACTED]



# More dredging is needed for the Hudson

Claudia Ackerman [REDACTED] >

Mon 8/21/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I live and work in Poughkeepsie, NY and urge the EPA remove from the report that the Remedy will be Protective'. The Hudson River must continued to be cleaned.

[REDACTED] on the Hudson. For the safety of all those that depend on the river for their livelihood, for the folks that recreate on the river and all our health, the EPA must continue their work.

Claudia Ackerman

[REDACTED]

Sincerely,

Claudia Ackerman

[REDACTED]

[REDACTED]

[REDACTED]

Dear Director Klawinski,

PLEASE KEEP  
FILE IN VER  
CLEAN

Sincerely,

Name: Jeff Adams

Address: [REDACTED]

E-mail: none @ none





**SCENIC HUDSON**

[scenichudson.org/pcbs](http://scenichudson.org/pcbs)



**RIVERKEEPER**

NY's clean water advocate

[riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)

NEW YORK NY 12205

SEP 2017 PM 16 L



# #HealthyHudson

Gary Klawinski

Director, Hudson River Field Office

U.S. Environmental Protection Agency

187 Wolf Road, Suite 303

Albany, NY 12205

**RECEIVED**  
SEP 06 2017



Dear Director Klawinski,

I live in Beacon, and here we cherish the  
river. I am deeply disheartened by the  
PCB clean up effort and I urge GE to  
be held fully accountable. Please ensure that  
the final EPA report states "the remedy is  
not protective." Do the right thing for our  
river!

Sincerely,

Name: Sam Adels

Address:

E-mail:



**SCENIC HUDSON**

[scenichudson.org/pcbs](http://scenichudson.org/pcbs)



**RIVERKEEPER**

NY's clean water advocate

[riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)

09 AUG 2017 PM 11

09 AUG 2017 PM 11



USA | forever

# #HealthyHudson

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

**RECEIVED**  
AUG 14 2017



# More dredging is needed for the Hudson

Deborah Adler [REDACTED] >

Mon 8/21/2017 3:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I live near the Hudson, and every day, I appreciate its waters. This magnificent resource must be protected, and the remedy proposed is NOT protective. You MUST remove from your report "the remedy will be protective."

PCBs are dangerous, PCBs must be further removed, in order for the Hudson to support healthful fish. So long as PCBs remain, this and all future generations will be at risk.

Please press for further remediation. We are all counting on you!

Sincerely,

Thank you.

[REDACTED]  
[REDACTED]  
[REDACTED]

COMMENT SHEET — 2017 Five Year Review Report  
Hudson River PCBs Superfund Site

Name (Please Print): Joanna Albertson

Agency/Organization: none - Homeowner on The Canal

Address: [REDACTED]

Written comments must be postmarked by September 1, 2017

COMMENTS:

My house is [REDACTED]  
[REDACTED] in Schuylerville. The canal  
has silted in at this site & has ~~stop~~ stagnant  
water, which often smells very bad. It is  
a breeding place for mosquitoes & poses a  
health hazard!

I have lived at this address since 1986  
& this is the first time that there has been  
this problem.

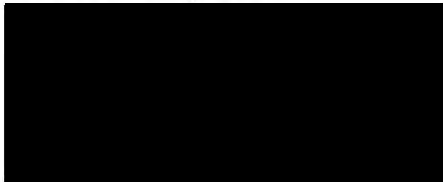
I was going to call the Board of Health to  
see what steps had to be taken to correct the  
situation. I'm expecting something to be done about  
this, and am also concerned about serious flooding  
issues. It is my understanding that the EPA has not

Written Comments can be sent by mail or email to:

Gary Klawinski, Director  
EPA Region 2, Hudson River Office  
187 Wolf Road, Suite 303  
Albany, NY 12205  
email: epahrfo@outlook.com

required the completion of the  
dredging as the canal is a part of  
the Hudson River. This is a serious  
and dangerous situation due to  
the suspected PCB's in the canal  
water

Albertson



ALBANY NY 120

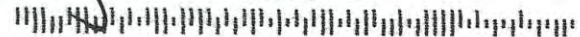
28 AUG 2017 PM 1 L



Mr. Gary Klawinski, Director  
EPA Region 2, Hudson River Office  
187 Wolf Road, Suite 303

Albany, New York 12205

12205-113878





# Protect people and wildlife, not GE

Tomara Aldrich [REDACTED] >

Fri 9/1/2017 12:47 PM

To: Gary Klawinski, Project Director, EPA <epahrfo@outlook.com>;

Sep 1, 2017

Mr. Gary Klawinski, Project Director, EPA  
US EPA Hudson River Field Office, Region 2, 187 Wolf Road, Suite 303  
Albany, NY 12205

Dear Mr. Klawinski, Project Director, EPA,

I can see the beautiful Hudson from the upper windows of my home in Nyack. Living in Brooklyn, I could see the Statue of Liberty, surrounded by the Hudson, from the park up the hill from my house in Sunset Park. I cross the GWB nearly everyday, and look across the Hudson at the Manhattan skyline. It's beautiful. I have been living and working at its edge for almost 20 years.

When I moved "upstream" from the city, I thought my access to the river would increase. Instead, when I take my [REDACTED] son for walks at Nyack Beach, I have to warn him to not go in the water. When he asks if we can fish, I tell we cannot. When he asks why, I'm never quite sure what to say. The fish are poison? Our government is unwilling to take the steps to make the waters and the fish that live in it safe enough to eat? That our agencies, meant to protect him, are putting the desires of a major polluting corporation over the safety of those who live, work, and recreate along its shores.

I am privileged enough to be able to buy all my groceries from a store. This is not the case for all of my neighbors. I see mostly people of color reeling in fish from the Tappan Zee viewing deck in Nyack, Nyack Beach, and other locations, to feed their children. This is terrible. These children are being fed poison, b/c you are putting a corporate interests above the safety of our children.

Please step up and do you job. Force GE to clean up its mess!

Thank you for the opportunity to submit my comments.

Sincerely,

Ms. Tomara Aldrich

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

FW: Hudson River Site (DBON-AN2FWH, PAD No. 17-63, RPL No. 171120)

Romanowski, Larisa <Romanowski.Larisa@epa.gov>

Mon 6/5/2017 1:39 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

---

From: Zachos, George  
Sent: Monday, June 05, 2017 10:03 AM  
To: [REDACTED]  
Subject: Hudson River Site (DBON-AN2FWH, PAD No. 17-63, RPL No. 171120)

Good Morning Ms. Allee,

Thank you for your correspondence!

Your e-mail below was forwarded to this Office this morning (June 5) for response.

Name (Optional): Elizabeth Allee

Organization (Optional):

E-Mail or Mailing Address (Optional): [REDACTED]

Phone (Optional):

Comments:

I live in Fishkill and am a lifelong Hudson Valley resident and I am beyond disappointed in the EPA Region 2 and Catherine McCabe for completely abandoning your duty the citizens in your region by letting General Electric off the hook for cleaning up their PCB mess in our Hudson River. It is totally unacceptable and I am honestly shocked that you would let a self-serving corporation that has for all it's history polluted the environment, get out of the cleanup that you deemed necessary to restore our river and the wildlife in it. By your own research the river is not close to being healthy, especially down-river, and letting Mother Nature take over is a total cop-out. Your announcement yesterday is completely unacceptable and it has made clear you have been influenced by a corrupt, anti-science administration that cares nothing about its citizens. If there is anything you can do to reverse this, I urge you to please consider it. What a devastating blow to all the progress we have made in the last 20 years.

Elizabeth Allee  
[REDACTED]

EPA's proposed Five Year Review report for the Hudson River PCBs Superfund site was released on June 1 for a 30-day public comment period. Your comments will be considered along with others we receive during this time.

Thank you!

Have a nice day,

George

George H. Zachos

Office of the Director

Accelerated Cleanup Manager and Regional Public Liaison (formerly Superfund Ombudsman)

[732-321-6621; toll-free, 1-888-BUDSMAN (283-7626)]

# EPA Second Draft Year Review

Richard Allen [REDACTED] >

Mon 8/21/2017 3:30 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

The Hudson was polluted by GE for many decades and we must monitor it's condition a long time to ensure that it has been totally resolved. Remember, GE left the US for China. GE has no allegiance to America. Treat them accordingly!

##

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Richard Allen  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Suzanne Allen [REDACTED] >

Mon 8/21/2017 3:30 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

"I am a resident of south Nyack. My family lives and plays in the river. I have been boating and fishing on the Hudson River. If we don't have a clean environment then nothing else matters.

##

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Suzanne Allen  
[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Roland Alley [REDACTED] >

Mon 8/21/2017 12:06 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I live in Ulster County and am privileged to enjoy the Hudson river and its watershed and all the bountiful recreational opportunities it provides. Please take this opportunity to pressure GE to clean up the toxic mess it has made over the course of decades. Thank you.

Sincerely,

Roland Alley

[REDACTED]  
[REDACTED]  
[REDACTED]

# Hudson River PCP cleanup review

thomas amisson [REDACTED]

Mon 8/28/2017 7:54 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

I am a ten year resident of Beacon, NY and a long time admirer of all that the Hudson River means to New York history, culture and ecology. I have seen much progress over the years in its return to a healthier environmental status. But more needs to be done to ensure its recovery.

I attended a well presented review of the PCP cleanup process at Poughkeepsie several months ago and was dismayed to hear how low the bar was set for GE's cleanup. Even though the negotiated target goals appear to be met, what concerns me is the possibility that GE may someday be off the hook for its responsibility to insure that the damage they did to this national landmark is further remediated, especially as new cleanup technologies are developed. Please insure that this will not happen.

Sincerely,

Thomas J Amisson

[REDACTED]

Sent from my iPhone

# EPA Second Draft Year Review

Mary Andrews [REDACTED] >

Fri 9/1/2017 2:23 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I was raised in Sleepy Hollow and, upon my retirement I moved to the wonderful city of Kingston. As part of my life in this community I volunteer at the Hudson River Maritime Museum where I meet many people from other states and countries who are visiting the beautiful Hudson Valley. They love our thriving river. They visit to play on our beach, kayak the Hudson and its tributaries and ask about fishing. I can't recommend fishing at this time.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

I, unknowingly, swam in the Hudson as GE was dumping its chemicals. My family and I wonder what ill effects this has had. GE should be responsible for removing the pollutants it dumped just as I would be required to remove garbage I dumped in a public street.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

With hopes of a more reasonable cleanup,

Sincerely,

Mary B. Andrews  
[REDACTED]  
[REDACTED]  
[REDACTED]



July 25, 2017

RECEIVED  
JUL 28 2017

EPA Region 2 Director Gary Klawinski  
U.S. EPA - Region 2  
187 Wolf Road, Suite 303  
Albany, NY 12005

Dear Sir,

I can only imagine how overwhelming your job as an EPA director might be. I imagine you feel quite helpless in the midst of the politics of "protection." It is certainly out of your control - the fact that the environment is assaulted and the assault is so overwhelmingly blatant that you personally can't do shite about it. I don't know how to help you, Mr. Klawinski, other than to mention that it will all be alright in the end. I understand the science is hard and people continue trying to change things that seem unchangable. All I ask of you is to be clear and concise with your language, telling us exactly what the data shows. please don't fudge the results by saying claim "will be protective" instead of "it is still dangerous, people" Just don't lie or fib about it, ya know? It's tacky.

Sincerely,

Be

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PM 2 L



EPA Region 2 Director Gary Klawinski  
U.S. EPA – Region 2  
187 Wolf Road, Suite 303  
Albany 12005

12205-119878



FW: hudson river

Klawinski, Gary J <Klawinski.Gary@epa.gov>

Wed 9/6/2017 9:43 AM

To: 'epahrfo@outlook.com' <epahrfo@outlook.com>;

From: [REDACTED]

Sent: Monday, August 21, 2017 7:19 PM

To: Klawinski, Gary J <Klawinski.Gary@epa.gov>

Subject: hudson river

Please ensure that the hudson river is protected. Thank You

Dear Director Klawinski,

It shouldn't be difficult to keep our standards of living <sup>at</sup>  
the same level and achieve economic growth & prosperity  
without polluting the waters. All it takes is a sound  
mind and creativity.

---

---

Sincerely,

Name: Emi Araki

Address: 

E-mail: 



scenichudson.org/pcbs riverkeeper.org/pcbs



# #HealthyHudson

RECEIVED  
SEP 01 2017



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

805-113878



# More dredging is needed for the Hudson

Patricia Arcuri [REDACTED] >

Mon 8/21/2017 3:32 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am a resident of the Hudson Valley for 40 years. The Hudson River is beautiful and historic and it is imperative that it be brought back to the state it was in before GE unleashed its poison.

The EPA must abandon the phrase "the remedy is not protective" from its report. Minimal approaches to the cleanup are not acceptable, and the work of the Superfund project must continue until newly discovered levels of PCBs are eliminated.

Thank you

Patricia A. Arcuri

Sincerely,

Patricia Arcuri

[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Al Arioli [REDACTED] >

Mon 8/21/2017 12:01 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

whatever you do, do it right, make it the best fix you can. There's no evading responsibility here. Al Arioli, [REDACTED]

Sincerely,

Al Arioli

[REDACTED]  
[REDACTED]  
[REDACTED]

# FW: Hudson River Site Five-Year Review (DBON-AN3RK3, PAD No. 17-66, RPL No.171139)

Romanowski, Larisa <Romanowski.Larisa@epa.gov>

Tue 6/6/2017 4:38 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

---

From: Zachos, George  
Sent: Tuesday, June 06, 2017 4:34 PM  
To: [REDACTED]  
Subject: Hudson River Site Five-Year Review (DBON-AN3RK3, PAD No. 17-66, RPL No.171139)

Good Afternoon Mr. Arthur,

Thank you for your correspondence!

Your e-mail below sent this afternoon was immediately forwarded to this Office (June 6) for response.

Submitted on 06/06/2017 12:18PM

Submitted values are:

Name: Dwight Arthur

Email: [REDACTED]

Comments: The EPA's decision to abandon the Hudson River is not consistent with the reason we have an EPA. Especially in the lower Hudson where no dredging has occurred, the EPA should mandate additional remediation.

EPA's proposed Five Year Review report for the Hudson River PCBs Superfund site was released on June 1 for a 30-day public comment period. Your comments will be considered along with others we receive during this time.

Thank you!

Have a nice day,

George

George H. Zachos  
Office of the Director  
Accelerated Cleanup Manager and Regional Public Liaison (formerly Superfund Ombudsman)  
[732-321-6621; toll-free, 1-888-BUDSMAN (283-7626)]



# Hudson River

Tom Artin [REDACTED]

Mon 7/24/2017 9:50 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Cc: pruit.scott@epa.gov <pruit.scott@epa.gov>; info@riverkeeper.org <info@riverkeeper.org>;

Dear Mr. Klawinski

I urge you to officially say the cleanup is not protective and more work is needed to ensure a healthy Hudson River. The points below should be addressed:

Below the Troy Dam — and all the way to Manhattan — the EPA's own studies show PCB concentrations in fish haven't declined as expected as a result of the upriver dredging.

With more PCBs left in the river than anticipated, additional dredging of the upper 40 miles of the Hudson River is necessary.

GE should be required to further investigate the lower 150 miles of the Hudson River to ensure cleanup goals are met.

EPA must give more weight to studies by federal and state agencies that challenge EPA's findings.

The cleanup cannot be declared complete by the EPA until the PCB contamination in the entire Hudson River reaches a level that does not threaten human health and the environment.

Tom Artin  
[REDACTED]

Dear Director Klawinski,

HELP MAINTAIN THE ETHICS &  
HONESTY THAT THE HUDSON  
RIVER NEEDS TO ENSURE ITS  
WHOLESOME & HEALTHY FUTURE  
WITHOUT PCB'S - TITEX  
ALL NEED TO BE REMOVED

Sincerely,

Name: \_\_\_\_\_

Address: \_\_\_\_\_

E-mail: \_\_\_\_\_



Judith Aspher





**SCENIC HUDSON**

[scenicudson.org/pcbs](http://scenicudson.org/pcbs) [riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)



**RIVERKEEPER**  
NY's clean water advocate

ALBANY NY 1220

AUG 21 2017 PM 2 1



# #HealthyHudson

REC'D  
AUG 24 2017

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

205-113878



# EPA Second Draft Year Review

Doris Bachmann [REDACTED]

Fri 9/1/2017 2:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

The report must state the remedy is not protective.  
EPA must remove from the report the phrase "the remedy will be protective."  
The report must call for additional dredging of PCBs in the upper Hudson.  
The report must call for an investigation of contamination in the lower Hudson.

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

My family and myself use the Hudson River in Manhattan for Kyacking and Boating and the ability to make our city vibrant and enjoy the Hudson as a resource for Recreational Activities for the enjoyment of Manhattan residents and Foreign Tourists is vital for our Economy and the enjoyment of our residents!

Sincerely,

Doris Bachmann  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

talya baharal-gnida [REDACTED]

Mon 8/21/2017 3:30 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am a resident of [REDACTED] in Ulster Park NY. We live on the Hudson river. We rely on the river for our drinking water. We boat and fish in this beautiful and majestic river of ours.

The EPA report must state that the remedy is not protective. The EPA must remove from the report the phrase the remedy will be protective."

We are very concerned and are demanding the EPA order additional dredging as the job is NOT FINISHED. There is more contamination still there than was anticipated after the initial cleanup was done.

At the very least you must insist on undertaking an immediate study of the contamination that exists down river and make a plan for fixing it. The cleanup is not done. I repeat - it is very important to us, the resident who live on the river, to us - the residents of Ulster County who rely on the river for our life, our water, our tourism and economy, and the beauty and heritage of this river - it is very important that the EPA report must state that the remedy is not protective. Thank you.

Sincerely,

Talya Baharal-Gnida

[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Patrick Bailey [REDACTED]

Mon 8/21/2017 3:37 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

As a resident of Kings County who hosts fishing clinics and teaches children how to fish all over New York City, I am extremely concerned about this report issued by EPA. The Hudson River is one of New York's most used and cherished resources, and I have seen first hand how true this is through the eyes of hundreds of program participants. Any action that furthers the contamination of this waterway and, in turn, harms the bodies of those who fish, swim, and kayak in it is wholly wrong.

I urge EPA to acknowledge that the remedy will not be protective, and to remove the phrase "the remedy will be protective" from the report. More remediation and dredging of PCBs is needed, as well as investigation into contamination present in the lower Hudson - where hundreds of adults and highly susceptible children regularly fish.

Having an awe-inspiring natural feature such as the Hudson can be such an incredible benefit to everyone who interacts with it, but only if they can rest assured that its waters are clean and safe. EPA can make sure this goal is reached - they just need to accept that contamination is present, more remediation is necessary, and more studies must be done.

Thank you for your time.

Sincerely,

Patrick Bailey  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Eric Baker [REDACTED]

Mon 8/21/2017 3:30 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear Sir-

My wife, child and I are currently residents in Brooklyn, but have lived and hope to live again in the Hudson Valley. We frequently hike and walk along the Hudson, and are deeply concerned that the forthcoming EPA report will limit the work that is being done to clean up the PCBs in the Hudson River when in our opinion the work must be scaled up. In particular, we do not accept the phrase "the remedy will be protective." In fact, research shows the remedy is not protective: we need to do even more to clean up the Hudson River for our lives and those of our children and the fish and animals which call the Hudson River Valley their home. Your own research shows--despite the six years of ongoing dredging in the Upper Hudson--that contamination is much higher than expected downriver. We need more data to determine if the timetables agreed to the Record of Decision are being met. If we scale back the work we've begun now, these timetables will be laughable and the value of our homes, properties and business will continue to be negatively impacted. Who, after all, wants to raise a family or come visit a superfund site? I strongly urge you to not accept that our work with PCBs in the Hudson Valley is done, especially without further data study. We need more remediation work.

Respectfully,

Eric Baker

Sincerely,

Eric Baker  
[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

marni bakst [REDACTED]

Mon 8/21/2017 12:03 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Please, please don't leave poisons in our beloved Hudson. Finish the clean-up once and for all so generations to come will be able to enjoy our beautiful river safely.

Sincerely,

marni bakst

[REDACTED]  
[REDACTED]  
[REDACTED]



# PCB"s in the Hudson River

KATHRYN BARRY [REDACTED]

Fri 7/7/2017 3:32 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

TO: Director of EPA Region 2

. Before the Hudson River cleanup began the EPA knew there were dramatically more PCBs well beyond "hot spots" targeted for removal, but it did nothing to alter its plan. The EPA is failing to protect the environment and our health. Falling short in the Hudson— one of the country's largest toxic cleanups—would undercut remediation of health-threatening pollution nationwide. This a a job that remains only partly done, leaving much toxic PCB residue to remain in the Hudson. Therefore It will remain in the food chain; Small fish will continue to secrete PCB's in their fat tissues, larger fish and humans, who depend on these fish to provide adequate food for their families, will be the recipients of these poisons. A job half done is not sufficient. Our Hudson must become as clean as we can make it. And GE must be held responsible to see that it occurs

Kathryn A. Barry  
[REDACTED]

# More dredging is needed for the Hudson

Scott Basal [REDACTED]

Mon 8/21/2017 11:23 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I have been concerned about this topic since it was first brought to my attention. I was not sure if dredging efforts would be successful at first, but I think it has been proven that they do work. The problem is that the cleanup efforts did not restore the river to its original conditions that existed before PCBs were dumped, therefore the damage that was done by GE exists to this day and there are STILL unacceptable levels of PCBs in the Hudson. I grew up in Voorheesville and I lived near the Henry Hudson Park in Selkirk, NY for 13 years and currently reside in Delmar, NY. My immediate family also resides in the area and me and my sister both have young children. It is my opinion that the Hudson River is not utilized as it should be in Albany. For various reasons, there isn't sufficient access to enjoy the river, but beyond that, the main issue is the fact that it is not suitable for enjoyment because of the contamination. Imagine if people could swim in and eat the fish out of the Hudson without having to worry about adverse health affects due to industrial contamination...it would be such an improvement to the quality of life in the area and be such a refreshing change to the current state of affairs in regards to access and enjoyment of the river. It should be as it was years ago...a gathering place for many activities that people enjoy, including the simple appreciation that goes along with being in an undisturbed natural setting. Right now the river is not ok to swim in and that is because of the PCB levels in the river. The cleanup is not finished and has not reached its goal to restore the river so it can be used by residents.

- the New York State Department of Environmental Conservation found that "The Remedy is not protective of human health and the environment based on uncontrolled risks, and EPA should undertake all necessary actions to ensure that the remedy becomes fully protective to the benefit of the people of New York State."

Please make the decision to finish the cleanup of the Hudson so we are not left with an unusable river for generations to come.

Sincerely,

Scott Basal  
[REDACTED]  
[REDACTED]  
[REDACTED]

GE took away my life's food supply + profited!

Dear Director Klawinski,

I live one block from the Hudson. Have been here  
all of my life. I can't catch and eat the fish!  
It is MY WATER and GE ruined it for me +  
my family. The PCBs need to be taken out  
ASAP! This cleanup is NOT PROTECTIVE  
of human health. <sup>+ envt</sup> GE must keep dredging now  
and rigorously measure PCBs in the lower Hudson.

Sincerely,

Name: Susan Basu

Address:

E-mail:

No delay! The problem  
is much bigger than  
originally estimated.  
Stop the politics! Help me!



[scenicudson.org/pcbs](http://scenicudson.org/pcbs) [riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)



# #HealthyHudson

RECEIVED  
SEP 06 2017



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



Dear Director Klawinski,

I have swam, walked, fished + boated  
on the Hudson throughout my life. The  
river needs to be cleaned up so that  
PCBs are no longer found in fish tissue  
the contaminants are removed.

The clean up effort has not rendered the  
river protective and your report needs  
to indicate that. You need to order continued  
cleanup of G ES PCBs for the health +  
wellbeing of the river + millions of residents  
who benefit from it.

Thank you.

Sincerely,

Name: Bill Pates

Address:

E-mail:

@



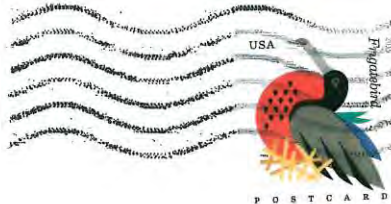
[scenichudson.org/pcbs](http://scenichudson.org/pcbs) [riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)



**RIVERKEEPER**  
NY's clean water advocate

WESTONHESTER NY 185

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# #HealthyHudson

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AUG 15 2017

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency,  
187 Wolf Road, Suite 303  
Albany, NY 12205



# Protect my children's access using the river! More dredging is needed for the Hudson

Cari Bates [REDACTED]

Mon 8/21/2017 3:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

My name is Cari Bates and [REDACTED]. We live in Kingston, NY and enjoy the river on a regular basis. It's a regular part of our recreational experiences and we draw from its beauty. Missing from that suite of experiences is the ability to catch and eat fish. I find it inexplicable (trust me I've tried to explain it [REDACTED]) that although we fish through the region, the fish from the Hudson are just too contaminated to eat. GE polluted this water. The remedy is not protective and this report should be revised to say so.

GE should be responsible to return the Hudson River to my children and future grandchildren for their use. The clean up is not complete. Please require it and revise this report to acknowledge the remedy is not protective.

Sincerely,

Cari Bates  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

I am a resident of Brooklyn and as a New Yorker, I care  
deeply about the health of the Hudson River. It is reprehensible  
for this scenic river to remain contaminated with PCBs.  
You must remove the unsubstantiated "will be ~~removed~~ protective"  
statements from the report.

Sincerely,

Name: Alex Beachamp

Address: [REDACTED]

E-mail: [REDACTED]





scenichudson.org/pcbs riverkeeper.org/pcbs

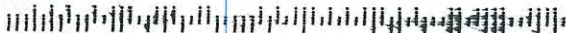


# #HealthyHudson

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SEP 01 2017



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# Protect people and wildlife, not GE

Laurel Becker [REDACTED]

Mon 8/28/2017 3:10 PM

To: Gary Klawinski, Project Director, EPA <epahrfo@outlook.com>;

Aug 28, 2017

Mr. Gary Klawinski, Project Director, EPA  
US EPA Hudson River Field Office, Region 2, 187 Wolf Road, Suite 303  
Albany, NY 12205

Dear Mr. Klawinski, Project Director, EPA,

August 28, 2017

I am a lifelong resident of the Hudson Valley. My mother raised me on stories of her childhood near the River, of her brothers swimming in the Hudson during the early years of the twentieth century, of her writing poetry as she sat along the banks of the River after a particularly difficult day.

I am appalled that the EPA considers GE's incomplete cleanup of PCB's from our waterways a success. Inconsistencies in the EPA's own reporting of the remaining PCB contamination and its harmful effects on our children, ourselves, and our environment are mind boggling. I do not understand how the EPA can report that the River is free of harmful PCB's while simultaneously NOAA warns against PCB contamination in Hudson River fish that is consumed by humans. I cannot understand this paradox because it is incomprehensible! I cannot understand this paradox because both conditions cannot exist. I cannot understand this paradox because the EPA is not being forthcoming in its reporting of PCB contamination.

Please do not negate fact in favor of fiction. Yes, we all wish that the River were free of PCB's, but basing life and death decisions regarding people's lives on fantasy rather than science is irresponsible and reckless at best, criminal in reality.

Sincerely,

Laurel Becker  
[REDACTED]  
[REDACTED]

Sincerely,

Ms. Laurel Becker  
[REDACTED]  
[REDACTED]  
[REDACTED]



Dear Director Klawinski,

The job is not done 50+  
years of waiting and hoping  
is not acceptable

Please compel GE to  
complete the clean up -  
it's their moral obligation.

Sincerely,

Name:

Andrew Bell

Address:

E-mail:



scenichudson.org/pcbs



NY's clean water advocate

riverkeeper.org/pcbs

# #HealthyHudson

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AUG 01 2017



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\$ 000.34<sup>00</sup>

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# More dredging is needed for the Hudson

Ros Bell [REDACTED] >

Mon 8/21/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

The remedy is not protective. And EPA must remove from the report the phrase the remedy will be protective."

The Hudson River Superfund cleanup has not done the job it was meant to do—secure the health of the river, its wildlife and the people living along it. PCB contamination in the river remains a significant threat to public health and prosperity—as it has for nearly 80 years.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective".

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered—after the remedy was determined—that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties—especially those who subsist on the river's fish—face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Ros Bell

[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Sandra Bensalah [REDACTED]

Mon 8/21/2017 11:23 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I can not believe the EPA is not going to force GE to clean the rest of the PCB's out of the Hudson!! That is not right by any means! The Hudson is a beautiful river, lived on it growing up. Future generations deserve a clean river. With the PCB's you don't dare eat the fish in the river. This was mandated years ago to be cleaned. I think it's important to hold them responsible for their actions. So that it doesn't happen again! Do the right thing, mandate GE finishes the clean up!!!

Sincerely,

Sandra Bensalah  
[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Lisa Berry [REDACTED]

Mon 8/21/2017 11:49 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

It is imperative that this situation be taken seriously. It is shameful and wrong that one of the greatest river estuaries in the US is polluted so terribly. Please help to rectify this urgently.

Sincerely,

Lisa Berry

[REDACTED]  
[REDACTED]  
[REDACTED]



Dear Director Klawinski,

Please make sure  
that the Hudson is restored  
to a pristine condition,  
like was agreed upon!!!

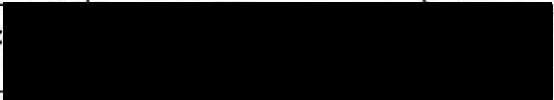
Sincerely,

Name:

Allen Blom

Address:

E-mail:





scenichudson.org/pcbs riverkeeper.org/pcbs



# #HealthyHudson

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Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# PCB Cleanup of Hudson River by GE

Cora Bodkin [REDACTED]

Fri 8/4/2017 8:29 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

To: Gary Klawinski, Director, EPA REgion 2

From: Cora Bodkin

Date: August 4, 2017

I urge you to require General Electric to do additional cleanup of PCBs that are negatively impacting the Hudson River. The amount of PCBs are much higher than the EPA believed when it first required a cleanup by GE. In consideration of this knowledge, and the known deleterious consequences of these chemicals, more action should be required by General Electric to clean up the mess they created.

# FW: PCB Continued Cleanup

Klawinski, Gary J <Klawinski.Gary@epa.gov>

Tue 8/15/2017 2:53 PM

To: 'epahrfo@outlook.com' <epahrfo@outlook.com>;

Cc: Romanowski, Larisa <Romanowski.Larisa@epa.gov>;

-----Original Message-----

From: [REDACTED]  
Sent: Wednesday, July 26, 2017 8:15 PM  
To: Klawinski, Gary J <Klawinski.Gary@epa.gov>  
Cc: info@riverkeeper.org; pruit.scott@eap.gov  
Subject: PCB Continued Cleanup

Dear Mr. Klawinski,

Please complete the unfinished work of cleaning up the PCB contamination in Hudson River for all the people living and using it today. It is incredibly important that you and GE do everything possible to make our river healthy again. As a naturalist who often meets school children and their parents at many sites along the river and an avid windsurfer, ice boater and swimmer, this is one of the most important issues of this time.

Please add additional dredging of the upper 40 miles and require GE to investigate the lower 150 miles and work with others to ensure that all cleanup goals are met.

It's very important for you and especially GE who created this disaster to continue to be responsible for health of the river and all living beings beside it even if it takes the next 100 years.

Thank you for the work you are doing.

Sincerely,

Betty Boomer  
[REDACTED]  
[REDACTED]

Sent from my iPad

Dear Director Klawinski,

PLEASE DEMAND THAT G.E. CONTINUE  
THE JOB IT STARTED → GO BACK TO  
THE HUDSON RIVER TO CLEAN UP ITS  
PCB MESS. THE FACT THAT THE FISH IN  
THE HUDSON WILL NOT BE EDIBLE FOR  
MORE THAN 50 YEARS IS SAD FOR THE FISH  
& AN EMBARRASSMENT FOR MANKIND.

Sincerely

Name: \_\_\_\_\_

Address: \_\_\_\_\_

E-mail: \_\_\_\_\_@\_\_\_\_\_





**SCENIC HUDSON**

scenichudson.org/pcbs



**RIVERKEEPER**  
NY's clean water advocate

riverkeeper.org/pcbs

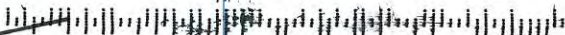
# #HealthyHudson

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AUG 01 2017



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MAILED FROM ZIP CODE 12601

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# EPA Second Draft Year Review

Danielle Brecker [REDACTED]

Mon 8/28/2017 4:10 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

To summarize, this is what I want to have happen:

- 1/ The report must state the remedy is not protective.
- 2/ EPA must remove from the report the phrase "the remedy will be protective."
- 3/ The report must call for additional dredging of PCBs in the upper Hudson.
- 4/ The report must call for an investigation of contamination in the lower Hudson.

I have lived in New York for 20 years and see the Hudson River everyday, but yet I have never eaten a fish from it or swam in it. This should not be the case. The Hudson River does not belong to General Electric to use for dumping; it belongs to the people of New York and earth.

Sincerely,

Danielle Brecker  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Nancy Breen [REDACTED]

Mon 8/21/2017 4:40 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

The Hudson is an important resource for my community (Tarrytown, NY). It must continue to be cleaned up and pollutants removed. The EPA must continue to monitor and protect our environment. Trump and Pruitt do not speak for me in any way. I have contacted my Congresswoman (Nita Lowey) and my two Senators (Schumer, Gillibrand) asking them to step in. I also plan to contact my local representatives and Governor Cuomo. THIS IS MY HOME AND MR. PBUITT--STAY OUT OF IT!

You do not have the consensus of the citizens of the Rivertowns, the citizens of New York State, or our country. You do not represent the people. You are supporting a fascist President and will fall with him.

I strongly oppose any cuts to the Hudson cleanup program and will continue to advocate strongly for an EPA that does its job. Pruitt--go home. You are not wanted here in New York.

Nancy J. Breen  
Registered voter  
[REDACTED]

Sincerely,

Nancy Breen  
[REDACTED]  
[REDACTED]  
[REDACTED]



Dear Director Klawinski

[REDACTED] We take her for frequent picnics on the banks of the Hudson. Is it safe? Please help us safeguard the river for future generations. Please ensure that EPA's final report states that "the remedy is not protective." Keep the Hudson clean and beautiful!

Sincerely,

Name:     Claire.brisystic    

Address:     [REDACTED]    

E-mail:                     @



**SCENIC HUDSON**

scenichudson.org/pcbs riverkeeper.org/pcbs



**RIVERKEEPER**  
NY's clean water advocate

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# #HealthyHudson

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

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AUG 14 2017

12205-113878



# More dredging is needed for the Hudson

Kristin Brown [REDACTED]

Mon 8/21/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

We're counting on you. This is the mighty Hudson River and the most symbolic representation of the great history of American enterprise and history. Keep it clean and make the polluters pay!

Sincerely,

Kristin Brown

[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Helene Browning [REDACTED]

Fri 9/1/2017 2:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I was always taught that if you are going to do a job, do it right. And what is being done in the Hudson River right now is far from right. I remember that as a child the Hudson was severely polluted and that when I got older there were promises to clean it up. Those promises have not been fulfilled. The cleanup should not be over as the PCB contamination remains a significant threat to people and wildlife.

When I grew up, I understood that the EPA stood for Environmental Protection Agency, so I expect the EPA to fulfill its mission of protecting human health and the environment. Six years of dredging is not enough time for the nation's largest toxic cleanup. The New York State Department of Environmental Conservation found, "The Remedy is not protective of human health and the environment based on uncontrolled risks, and EPA should undertake all necessary actions to ensure that the remedy becomes fully protective to the benefit of the people of New York State." The review made clear that fish and sediment of the Lower Hudson have not benefited from dredging of the Upper Hudson.

So I ask that the EPA report state that the remedy is NOT protective and remove the phrase "the remedy will be protective." I ask for additional dredging of PCBs in the upper Hudson and that an investigation of contamination in the lower Hudson be made.

[REDACTED], and it saddens me to know that the fight is still on as to whether we need to remove toxins from our environment. Cost should not be the deciding factor.

So if the EPA is going to do a job, please do it right. Our lives depend on it.

Regards,

Helene Browning

Sincerely,

Helene Browning  
[REDACTED]  
[REDACTED]  
[REDACTED]

July 25, 2017

RECEIVED  
JUL 28 2017

EPA Region 2 Director Gary Klawinski  
U.S. EPA - Region 2  
187 Wolf Road, Suite 303  
Albany, NY 12005

Dear Mr. Klawinski,

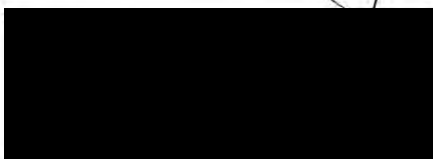
Thank you for taking the time to read my letter. The Hudson River is an essential part of my life. It connects me to my family in Brooklyn, my office in mid-town Manhattan (where I gaze at the river every day) to my home in Poughkeepsie.

I want to enjoy the Hudson for years to come without worrying about my children's health or my own. So I'm asking you to make sure the job gets done to clean it up. Your final report must say the cleanup is "not protective". Your final report has to be accurate and eliminate the claim that the clean-up "will be protective".

I think about the river every time I look out my window or taking a sip of water. I hope I can count on your integrity in this matter.

Sincerely,

Vonda Smooty



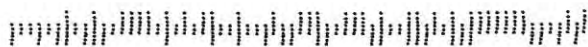
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ALBANY  
NY 1220  
25 JUL '17  
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EPA Region 2 Director Gary Klawinski  
U.S. EPA – Region 2  
187 Wolf Road, Suite 303  
Albany 12005

12205%1136 CC18



# Clean-up of Hudson River

[REDACTED]  
Thu 8/31/2017 6:52 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

To Gary Klawinski, Director, EPA Region 2, Hudson River Office:

I am writing to ask that the EPA continue to require General Electric to work on the clean-up of the Hudson River. The river has, unfortunately, not returned to a healthy status, and continued remediation is necessary.

Thank you,  
John Buckley

[REDACTED]

# FW: Please finish the cleanup of the Hudson

Klawinski, Gary J <Klawinski.Gary@epa.gov>

Tue 8/15/2017 3:12 PM

To: Public Comment Hudson 2nd FYR (epahrfo@outlook.com) <epahrfo@outlook.com>;

Cc: Romanowski, Larisa <Romanowski.Larisa@epa.gov>;

From: Tom Buckner [REDACTED]  
Sent: Friday, June 16, 2017 8:30 PM  
To: Klawinski, Gary J <Klawinski.Gary@epa.gov>  
Subject: Please finish the cleanup of the Hudson

Dear Mr. Klawinski,

My family and I live in Philmont, in Columbia County, NY. We are directly affected by the quality of the Hudson River -- our streams, our farmland, our water supplies, all of it. The EPA's decision to discontinue the cleanup, by GE, of the PCBs dumped into the river is a threat to us all. Please see to it that GE is required to finish the cleanup.

Thank you,

Tom Buckner  
[REDACTED]



More dredging is needed for the Hudson; the remedy applied is NOT protective.

Thomas Buckner [REDACTED]

Mon 8/21/2017 11:33 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

My wife and I live in Philmont, Columbia County, NY, about 10 miles from the Hudson River. The EPA's 5-year report on the partial clean-up of GE's waste dumping must note that the remedy that's been applied is not protective of human health and the environment. And the EPA must remove the phrase "the remedy will be protective" from the report, because it will not.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective".

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered—after the remedy was determined—that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties—especially those who subsist on the river's fish—face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable time frames as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Again, EPA must find that the remedy applied is not and will not be protective, and must order further cleanup.

Sincerely,

Thomas Buckner  
[REDACTED]  
[REDACTED]  
[REDACTED]

# Hudson River Cleanup

Budd, David [REDACTED] >

Thu 8/31/2017 6:42 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

RE: Hudson River Cleanup – removal of PCB contaminated sediment

Hello Mr. Klawinski,

I am in support of a resolution urging General Electric to finish the job of removing PCB contaminants from the Hudson River. I strongly urge you to support it as well, as the cleanup is essential to restoring the Hudson River to its full potential.

I understand there are over one hundred acres of contaminated sediment which lies outside the delineated dredging area where GE's cleanup is taking place. Studies have confirmed that PCB removal is the best solution to ensuring the Hudson River recover as a natural resource and vital economic region.

I hope you will seriously consider my concerns, and those concerns of a great number of residents and visitors to the Hudson Valley region.

Thank you,  
David Budd

[REDACTED]

# EPA Second Draft Year Review

Ted Buerger [REDACTED]

Fri 8/25/2017 1:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

To: Director Gary Klawinski (EPA Region 2 )

My wife and I live within [REDACTED] of the Hudson River in Westchester County, my office overlooks the lower Hudson River, and my wife and I regularly visit the Hudson River Valley, buy its local food, and enjoy its waterfront towns. With an entrepreneurial and venture capital background, I am actively involved in efforts to strengthen the Hudson Valley economy, from start-up ventures to vital local businesses and sustainable agriculture. As such, I recognize the centrality of an environmentally-healthy Hudson River to the aura of the region for healthy food, healthy recreation, and healthy communities. I appreciate the efforts many have made to build on the potential of this national treasure, for the benefit of all area residents.

Unfortunately, the Hudson River, with its storied history, national reputation and natural beauty, remains a victim of past administrations' failure to adequately restore and protect it. Contamination in fish, sediment and water are currently at unacceptable levels, much higher than were projected from the last remediation, and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is, in your parlance, "not protective."

It was understood and anticipated in the original cleanup plan that some PCBs would be left in the river. However, subsequent to determination of the remedy to achieve the plan's target levels, the EPA discovered that there were three to five times more contamination in the Upper Hudson than previously estimated. Yet the EPA did not materially expand the cleanup, thereby sacrificing the previously stated targets and with them the downstream objectives, including the quality, health and future of the Hudson River as a body. As a result, despite six years of dredging, contamination left in the river is significantly higher than expected and the River remains damaged.

Every afternoon from my office, I see people, usually lower income, fish off a local point. Should I in good conscience post signs up and down the river warning them that they face the same health threats today that they did before dredging commenced? Do we await the next news story warning residents and tourists that the PCBs have not been dealt with, that the EPA has been asleep at the switch or perhaps willingly succumbed to economic power houses like GE who have left the community, without fixing the damage they have done. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

My wife and I join with the many others who have noted that clearly more data is needed to determine if fish will recover in the reasonable timeframes agreed upon in the Record of Decision. We urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Isn't that, Director Klawinski, the purpose of the "Environmental Protection" Agency? Getting this information would seem the first and minimal step, and we are trusting you to stand up to the other pressures that surely exist, and do the job you are empowered to do.

With hopeful appreciation of your commitment to the Hudson River,

Sincerely,

Ted (and Helen) Buerger  
[REDACTED]  
[REDACTED]



July 25, 2017

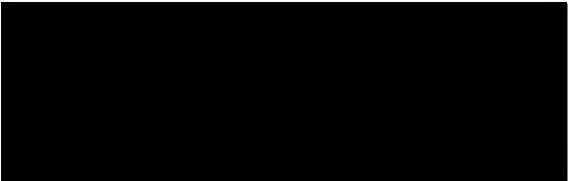
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JUL 28 2017

EPA Region 2 Director Gary Klawinski  
U.S. EPA - Region 2  
187 Wolf Road, Suite 303  
Albany, NY 12005

I have lived 30 minutes from the Hudson River and enjoyed the beautiful vistas, watered gardens in the surrounding areas and been taken with the regions beauty. I am deeply worried And urge the EPA to reconsider the conclusion of the second draft five-year review of the Hudson River Superfund project must plainly state it is not protective. You need to recognize that the clean-up ~~has~~ has not gone far enough. The PCB's are still out there and pose a huge cancer risk to me, my friends and family. Your final report should eliminate the unsubstantiated claim that the clean up will be protective. We the environment do not feel protected by your efforts thus far. Do better by us. Do your job. The world is counting on you.

Sincerely,

Jack Burke

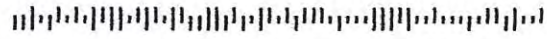


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EPA Region 2 Director Gary Klawinski  
U.S. EPA – Region 2  
187 Wolf Road, Suite 303  
Albany 12005

12205-113678



# More dredging is needed for the Hudson

Linda Burke [REDACTED]

Mon 8/21/2017 11:23 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am a resident of Ulster County. I love the Hudson River. It is a beautiful gift to New York State. We need to continue our efforts to clean it up. We can't stop now, the job is not done. As a citizen of NY, I demand that the lawmakers continue to make this clean up a priority.

thank you,

Linda Burke  
[REDACTED]

Sincerely,

Linda Burke  
[REDACTED]  
[REDACTED]  
[REDACTED]

# Hudson Clean-up

Sanford [REDACTED] >

Thu 8/31/2017 6:05 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Dear Director Klawinski,

I write to urge the EPA to continue active remediation efforts in the Upper Hudson as well to investigate PCBs in the Mid and Lower Hudson. The Hudson River, often called America's River, is a vital economic, recreational, and cultural resource for millions of people. It is the historic spine of our region and a critical source of water for communities and businesses on its shores. The EPA must do more to ensure the remediation will protect human health and the environment, and meet the goals from its original Record of Decision (ROD) in 2002.

Sanford Bush

[REDACTED]



# More dredging is needed for the Hudson

Brenda Campbell [REDACTED]

Mon 8/21/2017 12:01 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Hello there my name is Brenda Campbell I am a lifelong resident of this beautiful Dutchess County Hudson Valley born-and-bred. My children grow up next to the Hudson River and we have many memories playing in the water but I always felt a little skeptical especially when you read signs don't eat so many Fisher don't need this or avoid that we spent many days fishing releasing and making many memories good ones. But it saddens me that the EPA has not finished a job that it should have been finished a long time ago we want our clean Waters back we want it safe for people to swim to eat from the river. It's a God given right to have clean water and fish to eat. It saddens me how many things have been affected by the toxins in our environment today won't you please finish the job that you started I'm really praying that the generation that is here now leaves many less footsteps on this Earth then those before us.

Sincerely,

Brenda Campbell  
[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Alyssa Carbone [REDACTED]

Mon 8/21/2017 3:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am a resident of hopewell junction in the Hudson Valley and I work [REDACTED]  
[REDACTED] The pollution left behind by GE needs to be completely cleaned up. We should not be cutting slack for anybody who pollutes the environment.

Sincerely,

Alyssa carbone  
[REDACTED]  
[REDACTED]  
[REDACTED]

# Cleaning up the PCBs in the Hudson

Valerie Carlisle [REDACTED]

Wed 7/5/2017 12:20 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Dear Mr. Klawinski:

I attended the informational meeting in Poughkeepsie and found the presenter to be very interesting. I understand that the 5 year review does not tackle the problem of initiating a future plan. I am glad to see progress has been made but I am very disappointed in the idea of no future clean up. I do not believe the river is clean enough and more work should be done.

I am not a scientist and don't have all the resources that would enable me to advise exactly how to accomplish creating a cleaner and more protective of human health river, but I'm sure you do. It's important for us to protect our natural resources and I know that corporations like GE look only to their bottom line, and NOT public safety.

It's up to you and other concerned and intelligent EPA staff. Please promote more work on cleaning up our river.

sincerely,

Valerie Carlisle  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

Please continue the dredging of PCB's  
on the Hudson River. I would like the fish in  
the river to be fit for consumption in my  
grandchildren's lifetime. The environmental  
AND economic benefits outweigh the costs many too much

Sincerely,

Name: Arthur Carlucci

Address:

E-mail:



**SCENIC HUDSON**

scenichudson.org/pcbs riverkeeper.org/pcbs



**RIVERKEEPER**  
NY's clean water advocate

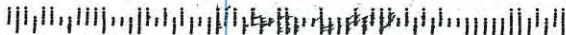
# #HealthyHudson

**RECEIVED**  
SEP 01 2017



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

205-113878



Dear Director Klawinski,

Enforce GE's commitment  
to clean up the BEPS.

It's time they got off  
their A and finished  
the job. We want a clean  
Hudson River

Sincerely,

Name:

MIANI @ ARNEVACE

Address:

E-mail:



scenichudson.org/pcbs riverkeeper.org/pcbs



# #HealthyHudson

RECEIVED  
SEP 01 2017



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# Hudson River Dredging

Jeremy Carpenter [REDACTED]

Mon 8/21/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I'm Jeremy and my family and I have lived near the Hudson River for many decades. We have long enjoyed the scenic and recreational benefits that the Hudson River provides, and concerned about elevated amounts of PCBs in parts of the river near where we live, we have long supported the PCB dredging and remediation project that EPA has helped oversee.

EPAs report should not list that the remedy would be effective. In fact I believe, based on recent independent scientific studies that the stated remedy is not protective.

There are numerous ways in which EPAs report and apparent recommendations about the dredging and PCB removal project are technically flawed and based in part on assumptions. EPA should review its technical findings and thoroughly compare them with the findings of independent scientists and river advocacy organizations. All of this should be carefully done and done without regard to political or industrial pressure.

Please thoroughly and objectively consider all public comments from Hudson Valley residents, scientists, and advocacy groups, and allow little input from corporations and politicians, most of whom have obvious biases and agendas which are not based on public health or a healthy river ecosystem. Please, for my family and the hundreds of thousands of residents, swimmers, fishermen, and wildlife that all rely on a healthy, clean Hudson River, fully finish the job of removing PCB pollution from the Hudson River.

I thank you very much for reading and considering my comments on this very important issue.

Sincerely,

Sincerely,  
[REDACTED]  
[REDACTED]  
[REDACTED]



Dear Director Klawinski,

I have worked on the Hudson River  
for 4 years. I have made my livelihood from  
this river and would like to continue. I have  
seen the river at its best and worst and  
know it still needs help. Please help us!

Sincerely,

Name: JAY CARTAGENA

Address:

E-mail:



**SCENIC HUDSON**

[scenicudson.org/pcbs](http://scenicudson.org/pcbs) [riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)



**RIVERKEEPER**

NY's clean water advocate

NEW YORK NY 12205

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**#HealthyHudson**

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

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SEP 06 2017



# More dredging is needed for the Hudson

Brian Caserto [REDACTED]

Mon 8/21/2017 11:47 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am a resident of Ulster County, and I use the Hudson for recreation.

I am concerned about the accumulation of toxic chemicals that have been dumped into the river.

Although progress has been made, it is not sufficient to allow GE to abandon their responsibility to clean up what they have polluted.

Regarding the upcoming report. The report must state that the remedy is not protective. The EPA must remove from the report the phrase "the remedy will be protective"

Sincerely,

Brian Caserto  
[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Thomas Cathcart [REDACTED]

Mon 8/21/2017 3:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

My family and I live in Red Hook, NY on the river. I am angry that GE is allowed to fall short of the acceptable cleanup goal.

Sincerely,

Thomas Cathcart

[REDACTED]  
[REDACTED]  
[REDACTED]

Tue May 30 13:15:22 EDT 2017  
Hope.Brian@epamail.epa.gov  
FW: hudson river  
To: CMS.OEX@epamail.epa.gov

---

**From:** [REDACTED]  
**Sent:** Tuesday, May 30, 2017 1:00 PM  
**To:** Pruitt, Scott <Pruitt.Scott@epa.gov>  
**Subject:** hudson river

Dear Mr Pruitt,

I care about the Hudson River and am urging you to protect it.

- We're closer to having a cleaner Hudson River, but action is needed to remove more toxic PCBs and get the job done right, once and for all!"
- "EPA must give New York State 'lead agency' status (responsibility for additional PCB cleanup). Only then will we realize the vision of a restored Hudson River."
- "Please issue a 'not protective' Five Year Review determination. As Riverkeeper and government agencies — DEC, NOAA, USFWS, and the New York State Attorney General — have all pointed out, the data indicates that the cleanup performed by GE is 'not protective' of human health and the environment."
- "EPA must require GE to undertake comprehensive sampling to determine as soon as possible what more needs to be done to meet the cleanup goals."

thank you for your attention to these important steps in taking care of our precious river.

Dana Chaifetz

[REDACTED]

# Tell EPA: Protect people and wildlife, not GE

Gwendolyn Chambers [REDACTED]

Wed 8/2/2017 3:01 PM

To: Gary Klowinski <epahrfo@outlook.com>;

Aug 2, 2017

Mr. Gary Klowinski  
US EPA Hudson River Field Office, Region 2, [187 Wolf Road, Suite 303](#)  
[Albany, NY 12205](#)

Dear Mr. Klowinski,

As a Hudson Valley resident who loves the river and the communities that surround it, I have the following comments on the EPA's Proposed Second Five-Year Review Report for the Hudson River PCBs Superfund Site.

The Hudson is a critical resource. The PCB cleanup is not protective of human health and the environment because it is not performing as planned. You must order more dredging in the Upper Hudson River, and we need a remedial investigation/feasibility study in the Lower Hudson River as soon as possible.

EPA's review must clearly state "the remedy is not protective." In the report you admit that General Electric's (GE's) cleanup of toxic PCBs it dumped in the Hudson River does not currently protect the health of the public or the river. That should be the only finding of the report. And you must remove the phrase "the remedy will be protective." Such a statement conflicts with your agency's admissions that the cleanup is not protective now, that at least eight more years of data are needed to predict future trends with any confidence, that the short-term 5-year fish tissue goal will not be met, and that more investigation is needed in the lower 150 miles.

The economic, recreational, cultural, and scenic value of the River is critical for future development and vitality for the Hudson Valley and New York City.

Because GE dumped over a million pounds of toxic PCBs into Hudson River from 1947 to 1977, a once vibrant commercial fishing industry has been closed down, the River has become one of the nation's largest Superfund sites, and the ability of people to consume fish from the river has been significantly restricted. As demonstrated by the public outcry at EPA's information meetings on its Five-Year Review Report, New Yorkers want a healthy Hudson River as soon as possible.

EPA's determination that the cleanup "will be protective" of human health and the environment for the Upper Hudson River is not

acceptable. This determination is inconsistent with the agency's admission that the cleanup is currently not protective and with EPA's repeated statements that at least eight more years of data are needed to predict future trends with any confidence. EPA's determination is further undercut by the agency's reluctance to provide specific time frames for reaching the short- and long-term goals. In addition, the National Oceanic and Atmospheric Administration (NOAA) recently published a peer-reviewed study suggesting that hazardous levels of PCBs will remain in fish in the Lower Hudson River for much longer than the EPA predicts. The New York State Department of Environmental Conservation (NYSDEC) has also expressed its concerns with the findings in the report, stating that the significant amount of contamination left in the river threatens both the public health and the environment. Therefore, EPA should revise its determination and recognize that the cleanup is not protective of human health and the environment.

The data show that the Lower Hudson River--the 150 miles south of the Federal Dam--is not responding as anticipated. EPA essentially admits that the cleanup is not working in the Lower Hudson River by failing to make a protectiveness determination that covers this stretch. From Poughkeepsie and continuing downstream, the decay rates (or rate of decrease in PCB concentration) in fish are not statistically different from zero. NYSDEC and the Hudson River Foundation do not expect the dredging to result in additional improvement in the Lower Hudson River. While EPA agrees that more investigation is needed, the agency has made no definite plans on how this will be done. Therefore, I urge EPA to require GE to do a full remedial investigation and feasibility study of the Lower Hudson River.

EPA should be more up front about the facts in its Five-Year Review Report. For instance, during Phase 1 of dredging, EPA discovered that it had underestimated both the depth of the PCB contamination and the concentration of PCBs in the surface sediment. Despite acknowledging that there were more PCBs present, EPA did not change the goals for the cleanup. Instead, EPA focused on removing a certain percentage of contaminated sediment, leaving behind two to three times more PCBs than anticipated. NOAA has stated that this means that cleanup goals targets will be met up to 60 years later than expected. The public has a right to know how much PCB contamination remains in the River today, and I hope that EPA will make that information clear and accessible in its final report.

For the Upper Hudson River, EPA has failed to evaluate all of the signs that the cleanup will not meet its goals, and instead made a determination based on hope rather than science. For the Lower Hudson River, EPA has recognized that the cleanup is not working as anticipated, but it has failed to provide a plan for a prompt investigation and cleanup. If Administrator Pruitt's words about doing Superfund better and faster mean anything, they should cause EPA to make a "not protective" finding for the entire Hudson River Superfund Site, order GE to take more PCBs out of the Upper Hudson River, and compel GE put its imagination to work devising a cleanup for the Lower Hudson River.

Thank you for the opportunity to submit my comments.

Sincerely,

Mrs. Gwendolyn Chambers

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



# FW: Hudson River PCB clean up

Klawinski, Gary J <Klawinski.Gary@epa.gov>

Tue 8/15/2017 3:12 PM

To: Public Comment Hudson 2nd FYR (epahrfo@outlook.com) <epahrfo@outlook.com>;

Cc: Romanowski, Larisa <Romanowski.Larisa@epa.gov>;

---

From: Martha Cheo [REDACTED]  
Sent: Saturday, June 17, 2017 11:47 AM  
To: Klawinski, Gary J <Klawinski.Gary@epa.gov>  
Subject: Hudson River PCB clean up

To Gary Klawinski, Director  
Hudson River Field Office  
U.S. Environmental Protection Agency

I do not agree with the recent determination that the Hudson River PCB cleanup is "protective of human health and the environment," because two to three times as many PCBs remain in the river than expected. More work is needed to ensure a healthy Hudson River. EPA's own data shows that below the Troy Dam (all the way to Manhattan), PCB concentrations in fish haven't declined as expected as a result of the upriver dredging. With more PCBs left in the river than anticipated, additional dredging of the upper 40 miles of the Hudson River is necessary. The EPA must require GE to further investigate the lower 150 miles of the Hudson River to ensure cleanup goals are met. The EPA must give more weight to studies by federal and state agencies that challenge EPA's findings. The EPA cannot declare the cleanup complete until the PCB contamination in the entire Hudson River reaches a level that does not threaten human health and the environment.

Martha Cheo  
[REDACTED]

# Tell EPA: Protect people and wildlife, not GE

Jeremy Cherson [REDACTED]

Wed 8/2/2017 3:31 PM

To: Gary Klowinski <epahrfo@outlook.com>;

Aug 2, 2017

Mr. Gary Klowinski  
US EPA Hudson River Field Office, Region 2, [187 Wolf Road, Suite 303](#)  
[Albany, NY 12205](#)

Dear Mr. Klowinski,

As a longtime Hudson Valley resident who loves the river, I have the following comments on the U.S. Environmental Protection Agency's (EPA's) Proposed Second Five-Year Review Report for the Hudson River PCBs Superfund Site. In summary: The Hudson is a critical resource. The PCB cleanup is not protective of human health and the environment because it is not performing as planned. You must order more dredging in the Upper Hudson River, and we need a remedial investigation/feasibility study in the Lower Hudson River as soon as possible.

EPA's review must clearly state "the remedy is not protective." In the report you admit that General Electric's (GE's) cleanup of toxic PCBs it dumped in the Hudson River does not currently protect the health of the public or the river. That should be the only finding of the report. And you must remove the phrase "the remedy will be protective." Such a statement conflicts with your agency's admissions that the cleanup is not protective now, that at least eight more years of data are needed to predict future trends with any confidence, that the short-term 5-year fish tissue goal will not be met, and that more investigation is needed in the lower 150 miles.

The Hudson River is a critical resource. The economic, recreational, cultural, and scenic value of the River form the bedrock of past development and future vitality for the Hudson Valley and New York City. Because GE dumped over a million pounds of toxic PCBs into Hudson River from 1947 to 1977, a once vibrant commercial fishing industry has been closed down, the River has become one of the nation's largest Superfund sites, and the ability of people to consume fish from the river has been significantly restricted. As demonstrated by the public outcry at EPA's information meetings on its Five-Year Review Report, New Yorkers want a healthy Hudson River as soon as possible.

The goals that EPA set to clean up the Hudson River are already weak. In the Upper Hudson River--the 40 miles north of the Federal Dam in Troy, NY--EPA expected that within 5 years of the completion of dredging, it would only be safe to eat one fish meal every two months,

and that within 16 years, it would only be safe to eat one fish meal per month. Under the cleanup plan, EPA did not expect people to be able to eat one fish meal per week for over 55 years. Because the timelines for the cleanup are so long, I expect EPA to hold GE accountable for meeting -- and not simply move the goal posts. In the meantime, I am concerned about the many people who eat fish from the Hudson River, and I urge EPA to do better outreach to subsistence and recreational fishing communities about the health risks.

There is already evidence that the cleanup will fail to meet the goals for the Upper Hudson River. Dredging was completed in 2015, and according to fish tissue data from 2016, the average concentration in the Upper Hudson River is 1.3 mg/kg. With concentrations at that level, it is almost certain that the 5-year goal of 0.4 mg/kg will not be met. Even assuming an 8% "decay rate," which is optimistic, the cleanup will miss this goal by more than 10 years. EPA should acknowledge in the report that the cleanup will very likely fail to meet this critical short-term goal, and then order GE to develop a plan of action, including more dredging if necessary, to get the cleanup back on track.

EPA's determination that the cleanup "will be protective" of human health and the environment for the Upper Hudson River is not acceptable. This determination is inconsistent with the agency's admission that the cleanup is currently not protective and with EPA's repeated statements that at least eight more years of data are needed to predict future trends with any confidence. EPA's determination is further undercut by the agency's reluctance to provide specific timeframes for reaching the short- and long-term goals. In addition, the National Oceanic and Atmospheric Administration (NOAA) recently published a peer-reviewed study suggesting that hazardous levels of PCBs will remain in fish in the Lower Hudson River for much longer than the EPA predicts. The New York State Department of Environmental Conservation (NYSDEC) has also expressed its concerns with the findings in the report, stating that the significant amount of contamination left in the river threatens both the public health and the environment. Therefore, EPA should revise its determination and recognize that the cleanup is not protective of human health and the environment.

The data show that the Lower Hudson River--the 150 miles south of the Federal Dam--is not responding as anticipated. EPA essentially admits that the cleanup is not working in the Lower Hudson River by failing to make a protectiveness determination that covers this stretch. From Poughkeepsie and continuing downstream, the decay rates (or rate of decrease in PCB concentration) in fish are not statistically different from zero. NYSDEC and the Hudson River Foundation do not expect the dredging to result in additional improvement in the Lower Hudson River. While EPA agrees that more investigation is needed, the agency has made no definite plans on how this will be done. Therefore, I urge EPA to require GE to do a full remedial investigation and feasibility study of the Lower Hudson River.

EPA should be more up front about the facts in its Five-Year Review Report. For instance, during Phase 1 of dredging, EPA discovered that it had underestimated both the depth of the PCB contamination and the concentration of PCBs in the surface sediment. Despite acknowledging that there were more PCBs present, EPA did not change the goals for the

cleanup. Instead, EPA focused on removing a certain percentage of contaminated sediment, leaving behind two to three times more PCBs than anticipated. NOAA has stated that this means that cleanup goals targets will be met up to 60 years later than expected. The public has a right to know how much PCB contamination remains in the River today, and I hope that EPA will make that information clear and accessible in its final report.

In short, EPA is hiding the ball. For the Upper Hudson River, EPA has failed to evaluate all of the signs that the cleanup will not meet its goals, and instead made a determination based on hope rather than science. For the Lower Hudson River, EPA has recognized that the cleanup is not working as anticipated, but it has failed to provide a plan for a prompt investigation and cleanup. If Administrator Pruitt's words about doing Superfund better and faster mean anything, they should cause EPA to make a "not protective" finding for the entire Hudson River Superfund Site, order GE to take more PCBs out of the Upper Hudson River, and compel GE put its imagination to work devising a cleanup for the Lower Hudson River.

Thank you for the opportunity to submit my comments.

Sincerely,

Mr. Jeremy Cherson

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

# former Bronx residents still care for the Hudson

Jeanhee Chung [REDACTED]

Wed 8/30/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

As a New Yorker and former Bronx resident who has enjoyed many a sail and even fished in the Hudson, I am very upset to find that we may no longer enjoy progress towards cleaner waters. Please call for additional dredging of PCBs in the upper Hudson, investigate contamination of the lower Hudson, and state in your report that the remedy is NOT protective.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Jean Chung  
[REDACTED]  
[REDACTED]  
[REDACTED]

# RE:Hudson river PCB claean up

CD Clarke [REDACTED]

Wed 7/19/2017 6:29 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

I strongly urge the EPA to classify the Hudson River PCB clean up as incomplete and start the wheels in motion to fully clean up the PCBs in the river. It has been determined by NY State DEC and other organizations to not be satisfactory and the EPA needs to step up and finish the job it started properly.

Sincerely,

C.D. Clarke

[REDACTED]

C.D. Clarke

[REDACTED]

# More dredging is needed for the Hudson

Lawrence Clarke [REDACTED]

Mon 8/21/2017 3:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

My name is Lawrence Clarke and i live in Albany, NY. I urge you to make General Electric Company complete the dredging of the toxic materials they disposed of in the Hudson River.

I and many of my friends would like to use the Hudson River for recreational purposes and as long as poisons remain in the river, we are unable to do so.

Thanks for your assistance.

Sincerely,

Lawrence Clarke

[REDACTED]  
[REDACTED]  
[REDACTED]

# Protect people and wildlife, not GE

Blythe Clark-McKittrick [REDACTED]

Thu 8/31/2017 1:14 AM

To: Gary Klawinski, Project Director, EPA <epahrfo@outlook.com>;

Aug 31, 2017

Mr. Gary Klawinski, Project Director, EPA  
US EPA Hudson River Field Office, Region 2, 187 Wolf Road, Suite 303  
Albany, NY 12205

Dear Mr. Klawinski, Project Director, EPA,

While I have never been to New York, it is clear to me that the Hudson River is a critical resource, and that the PCB cleanup is not doing enough to protect the health of the people or the environment.

I urge the EPA to order more dredging in the Upper Hudson River, to conduct a feasibility study in the Lower Hudson as soon as possible, and to set stronger goals for cleanup. Furthermore, as the agency's report has found that GE's PCB cleanup is insufficient, I urge the EPA to publish those findings without using phrases such as "the remedy will be protective" that only dilute the impact of your own findings.

We can't drink money.

Thank you for your time and consideration.

Sincerely,

Ms. Blythe Clark-McKittrick

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]



# Hudson River Dredging

Stephen Cluskey [REDACTED]

Mon 6/5/2017 11:50 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Dear Mr. Klawinski,

I would encourage the EPA to make the decision to continue dredging PCB's from the Hudson River. What has been done so far has not come anywhere near enough to cleaning the river to an acceptable level. Being able to safely eat one fish meal from the Hudson per week 53 years from now is not a restoration of our waterway.

Thank you for your attention.

Linda McCluskey

[REDACTED]

# EPA Second Draft Year Review

Nora Cofresi [REDACTED]

Fri 8/25/2017 1:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski:

I am concerned about the decisions being made at the highest levels of office - decisions that impact my grandchildren and great-grandchildren. Levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit/impact from the dredging project. The non-remedy will fall short of removing the 3-5x more contamination in the Upper Hudson than was expected - a thorough investigation/review is necessary. (Clearly, not protective.) The EPA needs to follow its own guidance for 5-year Reviews and include credible data and analyses conducted by NYS/federal agencies.

Let's do better in NYS than is done in DC.

Sincerely,

Sincerely, Nora G. Cofresi

[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

As a 20 year resident of the Hudson Valley, your  
remedy to clean the river is not a protective  
solution to remediate the PCB's and possible  
PFOA's that are flowing into the rivers  
of Newburgh.

Sincerely,

Name: Nancy Colas

Address:

E-mail:



**SCENIC HUDSON**

scenichudson.org/pcbs riverkeeper.org/pcbs



**RIVERKEEPER**  
NY's clean water advocate

ALBANY  
NY 122  
AUG 17  
2017

# #HealthyHudson

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SEP 01 2017



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

12205-113878



# EPA Second Draft Year Review

Jon Cole [REDACTED]

Fri 8/25/2017 1:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

My name is Jon Cole. I live in Elizaville, NY [REDACTED]  
[REDACTED]

Please, I beg of you, do the right thing and clean the Hudson.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Jon Cole  
[REDACTED]  
[REDACTED]  
[REDACTED]

July 25, 2017

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JUL 28 2017

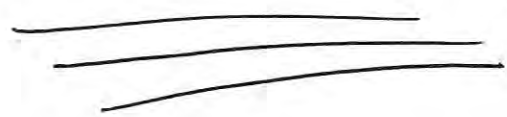
EPA Region 2 Director Gary Klawinski  
U.S. EPA - Region 2  
187 Wolf Road, Suite 303  
Albany, NY 12005

I am a resident of the Hudson Valley, specifically Orange County NY. I have lived in the Hudson Valley my entire life. I have lived, grown, work and have been educated in this area. I grow up in Rockland County and attended SUNY New Paltz. The environment, wildlife and beauty of the natural ecosystems here have shaped who I am, what I stand for and how I educate the students I work with.

EPA you must reconsider the conclusion of your 2nd Draft 5yr review of the Hudson River superfund project. 1) Your final report must plainly state the cleanup is "not protective." 2) Your final report should eliminate the unsubstantiated claim that the cleanup "will be protective." How can we support <sup>our students</sup> and ~~justify~~ encourage upholding standards if we don't hold others accountable for gross negligence and public health endangerment. As your job, as your moral obligation, for your appreciation of our future and the future of others access to resources in this environment, I ask that you not only hold GE accountable for cleaning up the Hudson River but that you adjust your IRIS risk exposure standards to include more current risk of exposure data for precursors in these matters!

With extreme concern,  
Sincerely,

Kelly Collins



Kelly Collins



ALBANY

NY 1220

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MAILED FROM ZI

EPA Region 2 Director Gary Klawinski  
U.S. EPA – Region 2  
187 Wolf Road, Suite 303  
Albany 12005

12205-119878



# public comment

Daniel Convissor [REDACTED]

Fri 8/25/2017 3:29 PM

To: EPA Hudson River Office <epahrfo@outlook.com>;

Dear Mr Klawinski:

I offer the following comment on the EPA's Proposed Second Five-Year Review Report for the Hudson River PCBs Superfund Site.

It is my understanding that significant PCB contamination still exists in the Hudson River and Champlain Canal. I urge the EPA to take further action to remedy this problem.

Sincerely,

Daniel Convissor

[REDACTED]  
[REDACTED]



# EPA Second Draft Year Review

Jennifer Convissor [REDACTED]

Mon 8/28/2017 4:10 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

My family and I live on the Hudson and it's own primary waterway and mode of swimming. We love how corporate entities like G.E. have been brought to task for their greed and exploitation of our river. We depend on our government to be our voice, to stand up to the behemoth polluters, who don't care about the health of our land, or our children. Please, don't dare back down now. I can't imagine, Mr. Trump, being a father himself, would encourage his agency to abandon the future of its planet and people.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Jennifer Convissor  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

james corcoran [REDACTED]

Tue 8/29/2017 1:50 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

My name is James Corcoran, I live in Montgomery New York and I am an avid fisherman and all,around outdoorsman. please do not let me and our children and grandchildren have to suffer through more. and more pollution by not finishing what was started. it is ALL of our responsibilities to make sure our enviroment is clean and safe for generations to come. Please do not hinder this by leaving the hudson river project unfinished.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

James Corcoran  
[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Isabel Cotarelo [REDACTED]

Mon 8/21/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

The EPA should continue the cleaning of the Hudson River.

Sincerely,

Isabel Cotarelo

[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

THE HUDSON RIVER IS ONE OF AMERICAS MOST  
BEAUTIFUL AND HISTORIC RIVER AND IT IS UNACCEPTABLE  
FOR THIS INCREDIBLE RESOURCE TO REMAIN CONTAMINATED W/  
TOXIC PCB'S. A HEALTHIER AND ACHIEVABLE FUTURE MUST BE  
PLANNED. I ASK THAT YOU REMOVE THE UNSUBSTANTIATED "WILL  
BE PROTECTIVE" STATEMENTS FROM THE REPORT AND  
RECOGNIZE THE HUDSON RIVER CLEANUP IS "NOT

Sincerely, PROTECTIVE"

Name: KYLE COTTIER

Address:

E-mail:



**SCENIC HUDSON**

scenichudson.org/pcbs riverkeeper.org/pcbs



**RIVERKEEPER**  
NY's clean water advocate

ALBANY  
NY 120  
AUG 17  
P.M.

# #HealthyHudson

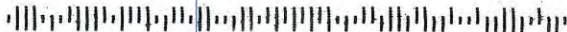
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Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# Hudson River PCBS Superfund

Linda Coupart [REDACTED]

Sun 7/9/2017 11:33 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Attn: Gary Klawinski, Project Director

Dear Sir:

I recently attended the 5 year review meeting in Poughkeepsie in regard to the above matter, and am writing to you as a citizen with real concerns.

Living in Marlborough area, which would be considered Section OU3 south from Troy to Battery Park, no dredging or capping has been done at all. From what I gathered, only samplings have and will continue to be taken to observe how the river is recovering. However, as indicated by your latest report, our area has been slow with recovery and in my opinion, this is because no actual dredging/capping has been done here, and actually additional PCB sediments have been caused to flow south into our area because of upper dredging in OU2 region.

Would you please advise me as to where there are heavy concentrations of PCB sediments in my region of OU3? This is of great concern to the Hudson Valley citizens. As a Representative of Meet Me In Marlborough, as well as, a member of Clearwater, this information is of utmost importance.

Also mentioned in the meeting was the fact that flood plains, marinas and properties along the Hudson have been impacted. Please advise where these are located.

In my opinion, more work has to be done in OU3 region to remove these PCB sediments by dredging, along with capping in areas where dredging is impossible. It is of great unfairness that the EPA primarily only addressed the upper regions of OU1 and OU2. This horrific mess caused by GE is beyond words, and the fact that they could bail at any time (and basically have already went on with business as usual) is unfathomable.

GE could bail at any time by just a name change and/or start new subsidiary companies to be blame free of "future" necessary funding. EPA should require a FUTURE Superfund be set up by GE acting as financial insurance so that GE or EPA appointed contractors can continue dredging/capping and restoring properties damaged due to GE's PCB pollution and destruction of our beautiful Hudson River. These expenses should not be shouldered by New York State Taxpayers. We must continue to rectify this travesty and we must not give up until "all" affected regions have been adequately addressed.

Thank you for your time and I look forward to a response.

Sincerely,

Linda M. Coupart  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Reva Cowan [REDACTED]

Fri 9/1/2017 12:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

We are residents of the lower Hudson Valley; the Town of Poughkeepsie in particular, with a Wappingers Falls mailing address. Our water supply comes directly from the Hudson River. It is not sufficient that dredging of the upper Hudson may in the future possibly clean up the Hudson River. As educated and concerned citizens of the area, we expect and hope that further dredging will clean this river. It took many many years for GE to contaminate the river. The present state of the river is not sufficiently clean for so many citizens to be dependent on it as a water source. Where is the concern for those of us who are dependent on the river as a water source?

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Michael and Reva Cowan  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

The Hudson River is the heart of not only NYC, but the entire region. We need it clean for our health and economy.

Sincerely,

Name:

Caroline Craig

Address:

[Redacted Address]

E-mail:

\_\_\_\_\_@\_\_\_\_\_





**SCENIC HUDSON**

scenichudson.org/pcbs riverkeeper.org/pcbs



**RIVERKEEPER**  
NY's clean water advocate

ALBANY  
12205  
29 AUG '17  
PM 2:11

# #HealthyHudson

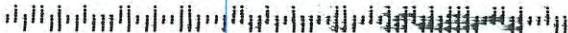
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MAILED FROM ZIP CODE 12601



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



July 25, 2017

EPA Region 2 Director Gary Klawinski  
U.S. EPA - Region 2  
187 Wolf Road, Suite 303  
Albany, NY 12005

RECEIVED  
JUL 28 2017

From: Patrick Cunningham



I am [redacted] and moved from N.J. to Florida 11 yrs ago. I am familiar with the Hudson River. Let's be frank, whoever put PCB contaminated waste into the river is responsible to remove it. GE has done some fine work, but they are avoiding their responsibility. They must complete the job to the satisfaction of the public. If the EPA is happy, well great, but it not a decision for them to make. They represent the citizenry not GE.

Sincerely,

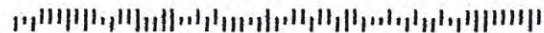
Patrick Cunningham 7/25/17

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EPA Region 2 Director Gary Klawinski  
U.S. EPA – Region 2  
187 Wolf Road, Suite 303  
Albany 12005

12205-119878



# EPA Second Draft Year Review

Lawrence Curtin [REDACTED]

Tue 8/22/2017 11:30 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I live in the lower Hudson River just South of Haverstraw. I am writing because I see and spoken to a lot of non-native-born immigrants fishing for their sustenance (mainly Spanish speaking but some Haitian). They uniformly express apathy and disdain for the warning signs placed up and down the banks on both sides of the river (I spoke with people on my side of the river, the Western shore). It is troubling that people, especially non-native people, fail to appreciate the long-term dangers posed by consuming contaminated fish and think it's all some kind of joke (indeed, while most people shook their heads in doubt of the veracity or even relevance of the warnings, there were way too many that just laughed).

While I believe in personal responsibility some people are not capable of understanding or simply lack trust in science/government and will ultimately pay a terrible price--unnecessarily--.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered--after the remedy was determined--that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Lawrence E Curtin  
[REDACTED]  
[REDACTED]  
[REDACTED]

# COMMENTS ON HUDSON RIVER PCB CONTAMINATION

Cutler, Nancy [REDACTED] >

Tue 8/29/2017 11:58 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

ATTN: Gary Klawinski; Director, Hudson River Field Office; U.S. Environmental Protection Agency

The Journal News/lohud Editorial Board recently commented on the EPA's prospective finding that GE's PCB cleanup of the upper Hudson River would be "protective" of human health and the environment.

Please include the following editorial as part of the public record of comments on the EPA's second five-year review of the Superfund cleanup.

Here is a link to our Editorial

<http://www.lohud.com/story/opinion/editorials/2017/08/25/epa-must-make-ge-clean-hudson-mess/594853001/>

Here is the full Editorial:

## EPA must make GE finish cleaning its Hudson mess

A Journal News editorial

You [can't eat any fish](#) caught from the Hudson River upstate; around here, women of childbearing age and children are told not to eat even a bite of fish from the river. That's how contaminated the river remains, specifically from cancer-causing PCBs left behind by General Electric's manufacturing plants.

That's why GE had to spend years dredging the upper Hudson, in an effort to rid the river of PCBs and meet goals set by the EPA as part of the nation's biggest Superfund project.

Now, the EPA is seriously considering releasing GE from further cleanup responsibility, even though the levels of polychlorinated biphenyls have dropped very little in upper Hudson fish, and testing so far has found no decline in contamination in fish downstream, in our Lower Hudson.

So how can the EPA possibly conclude that the dredging work completed in 2015, plus just waiting it out, will be "protective" of the Hudson?

It can't. But there's a good chance it will in its [five-year review](#) that's now underway. That would be an extension of this environmental disaster that's haunted the Hudson.

[APPRECIATION: Bob Boyle's quest to clean Hudson leaves a lasting legacy](#)

If the EPA sets the bar so low, there's virtually no way the feds — or the state Department of Environmental Conservation — will be able to compel GE to dredge more PCBs from the Hudson.

In June, the agency stated: "The review concludes that the Hudson River cleanup is working as designed and, while not yet protective, is expected to accomplish its long-term goal of protection of human health and the environment when the cleanup is completed."

That "protective" designation would mean that, along with "natural attenuation" — or without human intervention — the river is on track to heal itself.

That language counters what the actual results show: That fish from the Hudson cannot be safely consumed for decades to come.

So what's the EPA's goals for when can we safely eat fish from the Hudson, after this so-called "protective" work and "natural attenuation" remedy? Maybe within five years, adult males could eat one meal of Hudson-caught fish every two months. EPA thinks its an acceptable goal to wait 55 years for one meal a week to safely come from Hudson fish — and that's just for adult males, not women of childbearing age or children.

So much for "natural attenuation."

We long ago figured out that the old adage "dilution is the solution to pollution" is bunk. So why would the EPA bet on it now, with such a toxic and dangerously long-lasting substance as PCBs, which are linked to cancer, heart disease, respiratory issues, learning disabilities and more health problems? As Riverkeeper Legal Program Director Richard Webster recently told the Editorial Board, "It's bad science."

fun perks available to insiders!

The ongoing five-year review includes a public comment period, which ends Sept. 1. So far, about 400 comments have been received, which is a significant number of people engaged in such a technical review.

We'll include this editorial in those comments, as our way of letting the EPA know that the GE's dredging work done so far is in no way "protective" of our precious Hudson. We call on the federal agency to thoroughly document the continued PCB pollution and demand that GE must continue to remove the dangerous chemicals it left behind.

You can share your comments, too, by mail or email. Send comments to:

Gary Klawinski, Director  
EPA Region 2, Hudson River Office  
187 Wolf Road, Suite 303  
Albany, NY 12205  
Email: epahrfo@outlook.com

Thank you for you a en on to this important issue for New York and the Hudson River.

Nancy Cutler

Engagement editor/Rockland – Editorial Board member

The Journal News/ lohud.com



[REDACTED]

[REDACTED]

# Hudson River must be dredged for toxins

Caroline Cutroneo [REDACTED]

Tue 6/6/2017 4:41 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

To the EPA:

I am very disappointed by the EPA's decision to not recommend any further dredging for PCBs in the Hudson River. These materials must be removed from the river, as they are toxic and the latest research shows that these toxins remain in fish for very long periods of time.

PCB's are linked to many very serious health problems, including autism. Please do not compromise the health of millions of people who rely on the Hudson River. I urge the EPA to recommend dredging the Hudson until all of pollutants are removed.

[Chemicals banned decades ago linked to increased autism risk today](#)

## Chemicals banned decades ago linked to increased autism risk today

A group of man-made chemicals used in some pesticides and insulating materials banned in the 1970s continues to ...

Sincerely,  
Caroline Cutroneo



# PCB Clean-up, Hudson River

Peter Cutul [REDACTED]

Fri 9/1/2017 3:51 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Dear Gary,

It is with great dismay I discovered the news that the EPA has essentially declared "mission accomplished"

in terms of the Hudson River PCB clean-up. The latest studies show that the clean-up was not nearly effective

as it was supposed to be. The fact that approximately 1/3 of the PCB's dumped by General Electric are still in the River

including "hot spots" with levels far beyond accepted limits is unacceptable. I urge you to continue monitoring the River

and have GE continue the clean-up. The EPA must give more weight to not only State studies but also the findings of other Federal

agencies such as the US Fish and Wildlife Service that challenge EPA findings. The fact that people still will not be able to safely eat

fish out of the Hudson for decades points to the inadequacy of the "clean up." Please listen to the large majority of the citizens of

the Hudson Valley and continue the clean-up and rigorous study of the River's health. Thank you for your consideration.

Regards,

Peter Cutul  
[REDACTED]

# EPA Second Draft Year Review

Tara D'Andrea [REDACTED]

Tue 8/29/2017 5:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am a resident of Beacon, NY, a now thriving town on the Hudson River. Part of what has made Beacon successful after years of a depressed economy is the fragile progress that's been made to remedy decades of legacy pollution from the Hudson River and make it a resource suitable for recreation. This progress is by no means finished where the GE pollution case is concerned.

General Electric Co. appropriated the Hudson River and its wildlife when the company dumped more than 1 million pounds of PCBs into this publicly owned and irreplaceable natural resource. The job of remediation must be finished, and this is an obligation that EPA and GE share. The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is that remedy to date is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today as they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data are needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

The Hudson River and the people who use and depend on it deserve no less. The River was never GE's to take, and it is your job to restore it as per the goals of the original agreement, making the remedy protective.

Sincerely,

Tara D'Andrea  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Roya Darling [REDACTED]

Mon 8/21/2017 3:40 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am a mother and resident of Beacon, recently moving from [REDACTED]. One of the reasons for our move was to be closer to the beautiful Hudson River. I love to take my son to the river's playground and our family frequently meets there to walk around, play and take in the scenic beauty.

We are heartbroken that for the past century, GE has irresponsibly and unethically dumped pollutants into the Hudson River degrading the quality of the water and its health. These pollutants reduce our ability to fully enjoy the river, affecting our community and our economy.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

It is imperative the EPA step in immediately to declare GE's cleanup efforts "not protective" of human health and the environment. The EPA must force GE to take full responsibility and entirely remove all pollutants caused by their destructive actions.

Regarding the EPA report, I request these four points to be specifically stated:

1. The report must state the remedy is not protective.
2. EPA must remove from the report the phrase "the remedy will be protective."
3. The report must call for additional dredging of PCBs in the upper Hudson.
4. The report must call for an investigation of contamination in the lower Hudson.

I thank you for listening to my concerns around the dire and urgent need to protect our beloved Hudson River.

Sincerely,

Roya Darling  
[REDACTED]  
[REDACTED]  
[REDACTED]

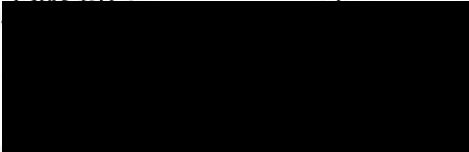
RECEIVED  
JUL 28 2017

To Mr. Gary Klawnski

Please Please keep our water clean. The PCB contamination is still an issue in our Hudson River. Please keep the clean-up complete when the PCB contamination in the entire Hudson River reaches a level that does not threaten human health and environment.

  
Dan Danie

Dante



ALBANY NY 120

25 JUL 2017 PM 11



Gary Klawinski  
Director Hudson River Field office  
US Environmental Protection Agency  
187 Wolf Road Suite 303  
Albany, New York 12205

12205-113878



# EPA Second Draft Year Review

George Dashnaw, III [REDACTED]

Wed 8/30/2017 3:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

I own a home on [REDACTED], at the heart of the dredging. Watched it happen for years and process and remedy's taken by GE and EPA were comical at best. I have an area that floods back from the river multiple time per year and was told there are no pcbs in the soil. Impossible when oil floats and for many years the river flooded back onto my property, but I'm sure every aspect of testing was done properly and in the best interest of family's and locals.

P.s. that last sentence was sarcastic.

Sincerely,

George Dashnaw  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Eileen de Munck [REDACTED]

Fri 9/1/2017 12:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am a disabled resident of the Hudson Valley. As I cannot travel, I depend on clean, safe water in the Hudson as my only recreational outlet. Your agency is the only protection we have, therefore I must request that your report MUST state the remedy is NOT protective. In addition, the EPA must REMOVE from the report the phrase "the remedy will be protective." The report must call for additional dredging of PCBs in the upper Hudson and call for an investigation of contamination in the lower Hudson

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Eileen de Munck  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Margaret Dean [REDACTED]

Mon 8/21/2017 4:50 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am a resident of New York City. I often spend leisure time on the Hudson River and I spend summer vacations with my family on or near the Hudson.

I urge that the report state that THE REMEDY IS NOT PROTECTIVE. The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective." The EPA must remove from the report the phrase "the remedy will be protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected. The report MUST call for additional dredging of PCBs in the upper Hudson.

Additionally, the report must call for an investigation of contamination in the lower Hudson. Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Margaret Dean  
[REDACTED]  
[REDACTED]  
[REDACTED]



# More dredging is needed for the Hudson

Susan deane-Miller, LCSW-R [REDACTED]

Mon 8/21/2017 11:20 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

The remediation that has been done is not enough, it is not protective. I live in the city of Poughkeepsie, and we drink water from the river. It is unconscionable to leave the pollutants in this water and not finish the cleanup. Please, I strongly hope that you will take us seriously and finish.

Sincerely,

Susan deane-Miller


[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

As a new resident of the Hudson Valley, (City of Beacon)  
I am greatly concerned with the information I have learned  
about the health of our beautiful river ecosystem. A healthy  
river means a healthy community, a healthy community  
means a ~~good~~ prosperous region. Please don't let us &  
future generations down.

Sincerely,

Name: Eva Deitch

Address: 

E-mail: 



scenichudson.org/pcbs



riverkeeper.org/pcbs

# #HealthyHudson

RECEIVED  
SEP 01 2017



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# Healthy Hudson - EPA cleanup of PCBs.

[REDACTED]  
Wed 6/28/2017 6:39 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Dear Director Klawinski,

In regards to the EPA cleanup of the Hudson River I would like to know more. As a life long resident growing up on the banks of the shores of the Hudson River (literally), as a credentialed merchant mariner for 18 years, as a educated Civil and Environmental Engineer, and as a Professional Engineer, I would like to see further cleanup of the Hudson River.

In my municipality, for over 37 years, our Towns water source is no other than the Hudson River. To me cleaning and protecting our waterbodies has been a life long mission.

It is my understanding that there are other PCB hotspots including one near Kingston, and others that I feel should be addressed. I am well aware of the acceptable permissible limits of PCBs in soil and sediment as regulated by the EPA. I do feel that protection of my family, the future generations, and the residents of New York State should be our utmost concern.

That being said I would like to know more information and hear more about any new plan the EPA may have to continue and expand cleanup. Additionally, I am concerned why a project will be deemed successful when it's established goals were not met.

At the present time and until I learn more I would ask that a detailed explanation be given as to the pros and cons in to continuation of current dredging program and what expansion of the program may be forthcoming.

Sincerely,

Darin DeKoskie, PE CPESC, CPSWQ  
[REDACTED]  
[REDACTED]

July 25, 2017

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JUL 28 2017

EPA Region 2 Director Gary Klawinski  
U.S. EPA - Region 2  
187 Wolf Road, Suite 303  
Albany, NY 12005

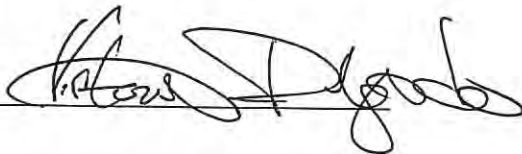
My name is Victoria. I currently reside in Florida but am personally interested and concerned in your five-year review of the Hudson River Superfund project because my family lives in Yonkers, NY. My family lives right along the Hudson River and are exposed to PCBs.

I would like for you to make an HONEST assessment of CURRENT river conditions. You need to acknowledge that the river is NOT PROTECTED. Residents of riverfront communities will face significant health and economic impacts! Out of INTEGRITY, your report should eliminate the ~~the~~ unsubstantiated claim that the cleanup "WILL BE" protective. It is critical that your final report MUST plainly state the cleanup is "not protective".

Our environmental laws haven't been re-authorized in years. I hope you take these laws and your position seriously for the best interest of all peoples, fish/animals, and land.

I trust you will <sup>create</sup> ~~do~~ the honorable report.

Sincerely,



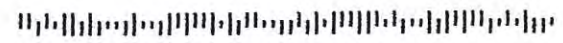
Victoria Delgado  
23625 Robbins Rd.  
Astatula, FL 34705

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NY 120  
25 JUL 17  
PM 11



EPA Region 2 Director Gary Klawinski  
U.S. EPA – Region 2  
187 Wolf Road, Suite 303  
Albany 12005

12205-113878



# More dredging is needed for the Hudson

[REDACTED]  
Mon 8/21/2017 11:30 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Let's get the Hudson River cleaned up ASAP. We live in Highland NY. The Walkway over the Hudson is in our backyard but the Hudson River is so polluted it's disgraceful to our tourism efforts in the Mid Hudson Valley.

Sincerely,

OA Dell  
[REDACTED]  
[REDACTED]  
[REDACTED]

# FW: PROTECT US NOT GE

Klawinski, Gary J <Klawinski.Gary@epa.gov>

Tue 8/15/2017 3:10 PM

To: Public Comment Hudson 2nd FYR (epahrfo@outlook.com) <epahrfo@outlook.com>;

Cc: Romanowski, Larisa <Romanowski.Larisa@epa.gov>;

---

From: Alexandra L DeRosa [REDACTED]  
Sent: Wednesday, June 21, 2017 10:13 AM  
To: Klawinski, Gary J <Klawinski.Gary@epa.gov>  
Subject: PROTECT US NOT GE

Dear Mr. Klawinski,

EPA's second FYR of the Hudson River PCB cleanup is unacceptable. There were 2-3x more PCBs in the Hudson River than expected when dredging began. This required EPA to change their plan of action. But you did not. EPA must give more weight to studies by federal and state agencies that challenge EPA's findings. More dredging is needed and further study of the UNTOUCHED lower 150 miles of the Hudson MUST be carried out.

Alex DeRosa



# Protect people and wildlife, not GE

JIM DESMOND [REDACTED]

Thu 8/24/2017 11:31 AM

To: Gary Klawinski, Project Director, EPA <epahrfo@outlook.com>;

Aug 24, 2017

Mr. Gary Klawinski, Project Director, EPA  
US EPA Hudson River Field Office, Region 2, 187 Wolf Road, Suite 303  
Albany, NY 12205

Dear Mr. Klawinski, Project Director, EPA,

We need the EPA now, more than ever. The Hudson is on its way to being the cleanest it has ever been in 150 years. You are the man who can make a stand for clean water and the future of this great river. Keep it getting greater while you are in office.

Sincerely,

Jim Desmond  
[REDACTED]  
[REDACTED]

Sincerely,

Mr. JIM DESMOND  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Yvonne Devlin [REDACTED]

Mon 8/21/2017 11:37 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I have lived in Poughkeepsie all my life. Three previous generations of my family have lived along the Hudson River from Wappingers Falls to Albany. The Hudson has always been our life blood. I have daughters who live and work here. One of my daughters goes to school at [REDACTED] right on the river front and my works at [REDACTED].

More dredging is needed to clean up our Hudson.. but the EPA report must make it clear " the remedy is not protective" it must remove the phrase "the remedy will be protective" from the report.

It is my hope and the future children of the Hudson valley hope, " the remedy will be protective" will be deleted from the EPA report.

Thank for your consideration,

Sincerely,

Yvonne T. Devlin

[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Mr. & Mrs. Frank Joan DiChiaro [REDACTED]

Tue 8/22/2017 10:00 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

We are residents of Athens / Sleepy Hollow Lake

PLEASE DO NOT IGNORE THE HEALTH NEEDS OF THE HUDSON RIVER A vast variety of life forms depend on its viability (Including us and our two family dogs !!) Thank you

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Joan

[REDACTED]  
[REDACTED]  
[REDACTED]

# PCB cleanup in the Hudson is not finished!

Joanna Dickey [REDACTED]

Fri 9/1/2017 7:13 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>; pruit.scott@epa.gov <pruit.scott@epa.gov>;

Dear Gary Klawinski,

I urge you to please officially declare that the PCB cleanup of the Hudson River is not finished, and require GE to finish the job.

- Below the Troy Dam — and all the way to Manhattan — the EPA's own studies show PCB concentrations in fish haven't declined as expected as a result of the upriver dredging.
- With more PCBs left in the river than anticipated, additional dredging of the upper 40 miles of the Hudson River is necessary.
- GE should be required to further investigate the lower 150 miles of the Hudson River to ensure cleanup goals are met.
- EPA must give more weight to studies by federal and state agencies that challenge EPA's findings.
- The cleanup cannot be declared complete by the EPA until the PCB contamination in the entire Hudson River reaches a level that does not threaten human health and the environment.

I am an outdoor educator that teaches people, especially children, about the treasure which is our Hudson River, and it is our job to protect it and restore its health for future generations.

Please continue to monitor the river and request GE to continue with the clean up.

Thank you,

Joanna Dickey  
[REDACTED]

July 25, 2017

RECEIVED  
JUL 28 2017

EPA Region 2 Director Gary Klawinski  
U.S. EPA - Region 2  
187 Wolf Road, Suite 303  
Albany, NY 12005

Dear Sir,

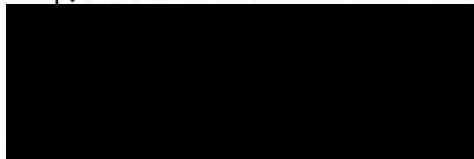
It is with great shock and sadness that I write to you regarding the real condition of the scenic Hudson river. The river, despite all the citizen initiated beautification along its banks and the Hudson Valley remains polluted with dangerous levels of PCBs.

EPA must reconsider the conclusion of its Second Draft Five-year Review of the Hudson River Superfund project. 1) your final report must plainly state the cleanup is "not protective." 2) your final report should eliminate the unsubstantiated claim that the cleanup "will be protective." Indeed the current levels of contamination in fish, sediment + water are much higher than expected. It behoves the EPA to do the job they have been designated for. In trust of your integrity.

Sincerely,

Peter Donit - Kuchak

RITA D&T-KOBAK



ALBANY

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MAILED FROM ZI

EPA Region 2 Director Gary Klawinski  
U.S. EPA – Region 2  
187 Wolf Road, Suite 303  
Albany 12005

12205-113678



# EPA Second Draft Year Review

Jennifer Dobson [REDACTED]

Tue 8/22/2017 11:00 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am writing to ask you to make significant changes to the EPA's Five Year Technical Review on Hudson River PCB Cleanup. The report needs to take a stronger stance on protecting our river.

I am currently a resident of San Diego, CA, but I grew up on the Hudson River and return for visits approximately three times per year. The Hudson River holds a special place for me. I have fond memories of summertime boating and swimming or picnicking along the banks of the river at the many public historical sites and mansions. I value the Hudson's significant role in preserving our national heritage. It was of critical importance during the Revolutionary War, and it was a primary route for early western expansion in the northern states. Even today, when I see monolithic cargo traveling by barge -- such as an 8 million pound steam generator shipped earlier this month -- I am struck by how our Hudson is still such a valuable resource to so many people.

The Hudson River is a national treasure that must be preserved.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The EPA must remove the statement that the remedy will be protective and instead conclude that the remedy is not protective.

After the remedy was decided upon, the EPA discovered more PCBs than originally estimated in the Upper Hudson. The EPA cleanup must be expanded and additional dredging must be done.

Riverfront residents of mid- and downriver counties face the same health threats today that they did before dredging began. The EPA must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

Sincerely,

Jennifer Dobson  
[REDACTED]  
[REDACTED]  
[REDACTED]

# Dredging

[REDACTED]  
Sat 6/10/2017 7:47 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

As a long time Dutchess County resident, I am in favor of continued dredging to thoroughly clear PCB contamination from the Hudson River bottom. This is a vital issue for our region. Thank you very much. Sincerely, Ron Dombroski [REDACTED]  
[REDACTED]



Dear Director Klawinski,

I am a resident of the NYC area and it greatly alarms me that the Hudson remains contaminated with toxic PCBs. General Electric needs to be held accountable for meeting ALL the health and remediation goals for the Hudson River PCB Superfund cleanup. We need a revised plan since our current cleanup is not working as

Sincerely,

Name: JUDY DONG

Address:

E-mail:

effectively as we anticipated.



**SCENIC HUDSON**

[scenichudson.org/pcbs](http://scenichudson.org/pcbs)



**RIVERKEEPER**  
NY's clean water advocate

[riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)

NEW YORK, NY 12205

SEP 2017 PM 16 L



# #HealthyHudson

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SEP 06 2017

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# EPA Second Draft Year Review

Elke D'Onofrio [REDACTED]

Fri 9/1/2017 2:10 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am a life long resident of Northern Bergen County. We have used the Hudson recreationally for many years.

Studies of PCBs in humans have found increased rates of melanomas, liver cancer, gall bladder cancer, biliary tract cancer, gastrointestinal tract cancer, and brain cancer, and may be linked to breast cancer.

Clearly the report must state the remedy is not protective and the EPA must remove the phrase "the remedy will be protective."

Additional dredging of the the upper Hudson is clearly called for to mitigate the horrible effects of PCB's. Additionally, the lower Hudson must be investigated to determine the level of PCB contamination.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Elke D'Onofrio  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Colleen Dougherty [REDACTED]

Wed 8/30/2017 2:30 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I grew up in the Hudson valley, and recently relocated back to the region with my two young boys and husband, from Brooklyn. The Hudson River has connected me to this region my whole time in NYC, and in these last 20 Years, yes the river appears in better shape than - but it is by no way done and finished on the EPA part. The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

The report must state the remedy is not protective.

EPA must remove from the report the phrase "the remedy will be protective."

The report must call for additional dredging of PCBs in the upper Hudson.

The report must call for an investigation of contamination in the lower Hudson.

Sincerely,

Colleen dougherty

[REDACTED]  
[REDACTED]  
[REDACTED]

# Why would you let them off the hook?

Ryan Doyle [REDACTED]

Tue 8/29/2017 1:12 PM

To: Gary Klawinski, Project Director, EPA <epahrfo@outlook.com>;

Aug 29, 2017

Mr. Gary Klawinski, Project Director, EPA  
US EPA Hudson River Field Office, Region 2, 187 Wolf Road, Suite 303  
Albany, NY 12205

Dear Mr. Klawinski, Project Director, EPA,

Unless you're trying to curry favor with someone at GE, what could possibly be gained by letting them stop the cleanup?? I don't get it. Please do the right thing and make them continue to clean up this horrible mess they spent decades creating.

Sincerely,

Mr. Ryan Doyle  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Jacquelyn Drechsler [REDACTED]

Fri 9/1/2017 2:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I currently reside at [REDACTED] and grew up in Palisades N.Y., spending almost every day of my life down at the Hudson River as well as on the Hudson River, which I always found to be enthralling.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "the remedy is not protective." I urge you to remove the phrase "The remedy will be protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging, contamination left in the river is significantly higher than expected. Obviously the "clean-up" has not been achieved to your agency standards or the citizens standards, in order to protect human health needs as well as the aquatic and wildlife needs. There needs to be additional dredging of the Upper Hudson. The clean up can not be done to G.E's standards, that is a self-report that clearly does not address the situation. The job needs to get done.

The EPA is mandated to protect the environment- upstream, downstream, wetlands, shores, wildlife, aquatic life. You work and report to us - not a corporation. Please keep that in mind. The people are sick and tired of the continued existence of PCB's that threaten all life.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. Nothing has changed regarding the safety of eating fish. At the very least, you must undertake an immediate study and investigation of the Lower Hudson downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Looking forward to the EPA standing up to G.E. and working for the safety of the people and the environment. Looking forward to a cleaner Hudson River - Uppper and Lower, that allows people to eat fish they catch with out the worry of danger. Looking forward to a healthy aquatic life that allows fish to live - not die. Looking forward to an annual Shad festival!

Sincerely,  
Jacquelyn Drechsler  
[REDACTED]

Sincerely,

Jacquelyn Drechsler  
[REDACTED]  
[REDACTED]



# More dredging is needed for the Hudson

Jill Dunay [REDACTED]

Mon 8/21/2017 3:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

You have the power to clean the Hudson River. Please will you do so? This is needed for the health of the millions of people living around it. God help you to do this. Thank you.

Sincerely,

Jill dunay

[REDACTED]  
[REDACTED]  
[REDACTED]



# More dredging is needed for the Hudson

James Dunn [REDACTED]

Mon 8/21/2017 11:43 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

No way EPA should not be compelling GE to completely clean up toxic waste it is responsible for leaking into our waterways.

Sincerely,

Jake Dunn

[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

My name is Rebecca and I am a resident of Dobbs Ferry. Growing up in Dobbs Ferry along the Hudson River, I can tell you the Hudson River is what makes that town so special, but it is up to us to keep it that way. The Hudson River is an incredible resource for many and a home to many species. It is imperative that we keep it free of contamination, free from toxic PCB's.

Sincerely,

Name: Rebecca Dwyer

Address:

E-mail:

cleanup is not protective



[scenichudson.org/pcbs](http://scenichudson.org/pcbs)



[riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)

# #HealthyHudson

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USA



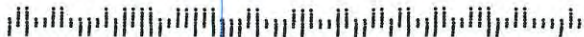
Gary Klawinski

Director, Hudson River Field Office

U.S. Environmental Protection Agency

187 Wolf Road, Suite 303

Albany, NY 12205



# EPA Second Draft Year Review

Jeff Economy [REDACTED]

Wed 8/30/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am Jeff Economy, a resident of Saugerties, NY. I moved here from my home town of Chicago to live a healthier, cleaner life, and my home is just a few minutes' walk from the Hudson River. I'm very concerned about the degree of PCB cleanup still needed on the Hudson River.

The cleanup efforts that have been made to date are not enough. Contamination in fish, sediment and water are currently much higher than expected -- the lower Hudson River has seen little beneficial impact from the dredging project. The only conclusion one can draw is that the remedy is not protective.

It is known that the original cleanup plan accounted for some PCBs being left in the river. After the remedy plan was determined, however, the EPA discovered that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies. The EPA must remove from the report the phrase "the remedy will be protective. The report must call for additional dredging of PCBs in the upper Hudson, and the report must call for an investigation of contamination in the lower Hudson.

Thank you,  
Jeff Economy

Sincerely,

Jeff Economy  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Seth Edelman [REDACTED]

Mon 8/21/2017 3:30 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I live near Albany NY. I have used the Hudson for boating and fishing. I cannot eat the fish, of course. It seems the EPA is following a politically determined path as regards the Hudson River cleanup. What about the Five Year review and considering credible data? Have the actual health threats been diminished significantly? How much PCB has been left in the river vs the amount removed? Aren't current levels of environmental contamination much higher than the anticipated levels? How can the work done on the basis of old data and plans be deemed protective absent more analysis? The remedy is not protective - what has actually gotten better ? "Remedy will be protective" is incorrect. It should be excised. We need more remediation in the upper river and more analysis of lower river pollution. Thank you.

Sincerely,

Seth J Edelman  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

~~PLEASE~~ HELP MAKE OUR RIVER  
CLEAN AGAIN. IT IS THE MOST  
SAD FACT THAT THIS GORGEOUS  
GIFT THE HUDSON RIVER REMAINS  
UNSAFE FROM PCB AND MORE

THANK YOU

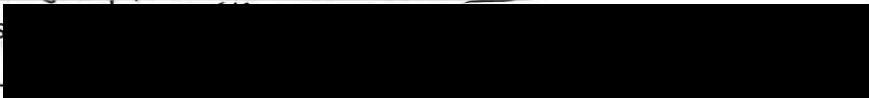
Sincerely,

Name:

Jane Ehrlich

Address:

E-mail:





**SCENIC HUDSON**

scenichudson.org/pcbs riverkeeper.org/pcbs



**RIVERKEEPER**  
NY's clean water

# #HealthyHudson

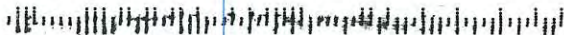
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0003173553 AUG 29 2017  
MAILED FROM ZIP CODE 12601



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# Much more dredging is needed for the Hudson

SARITA EISENSTARK [REDACTED]

Mon 8/21/2017 11:47 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I've lived in Hastings-on-Hudson, NY since 1974 and love the Hudson River.

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered—after the remedy was determined—that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

The review makes clear that PCB levels in the fish and sediment of the Lower Hudson have not benefited at all from upriver dredging. In fact, NYSDEC and the Hudson River Foundation do not expect the dredging to result in additional improvement in the Lower Hudson River. So we are stuck with a botched cleanup of toxic Hudson River PCBs

I live in the valley of the Lower Hudson River and urge you to support the most comprehensive cleanup scientifically possible. Thanks you.

Sincerely,

SARITA EISENSTARK

[REDACTED]  
[REDACTED]  
[REDACTED]



# More PCB Dredging Needed

Wally Elton [REDACTED]

Fri 9/1/2017 7:18 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Gary Klawinski,  
Director EPA Region 2, Hudson River Office

I write to call on the EPA to require further dredging of the upper Hudson River to remove additional PCB's now in order to hasten the restoration of water quality and the and the safety of fish consumption by the public.

We are supposed to be moving toward rivers that are safe for swimming and fishing under the Clean Water Act. Fifty plus years is much too long to wait for such conditions in this magnificent river. I frankly do not care what GE has spent or agreed to in the past. The company is responsible for the massive contamination of a public resource. It must do whatever is needed to restore the damage it has done to the river and the communities along it. We now have data showing clearly that more action is required to clean up the river in a reasonable timeframe.

But, of course, it is not just the river that is of concern. In the Schuylerville, NY, area, for example, there is an intact section of the historic original Champlain Canal. People live along one side of it, and a portion of the multi-use Champlain Canalway Trail runs along the other side. There also has been considerable interest in making that section useable by paddlecraft. And local resident fish there, as well. But the canal is contaminated with PCB's from past river flooding, and the water drains into the Hudson River. This canal must also be cleaned up.

Please do not leave things as they are. More dredging is needed. Thank you.

Wallace Elton  
[REDACTED]

# More dredging is needed for the Hudson

KATHERINE ENBERG [REDACTED]

Mon 8/21/2017 3:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

IS THERE ANYONE THAT BELIEVES IN PROTECTING THE ENVIRONMENT AND PEOPLE DIRECTLY AFFECTED BY THIS PROBLEM LEFT IN OFFICE? I AM A [REDACTED] WHO IS CURRENTLY LIVING IN THE ALBANY NY AREA. THE PEOPLE HERE ARE VERY SICK. AND IT IS GE'S FAULT. THE CLEANUP EFFORTS ARE A GOOD START TO ALLEVIATE THESE ISSUES. BUT OUR WORK HERE IS NOT DONE. THE DREDGING REMEDY HAS SHOWN VAST IMPROVEMENT IN THE AREA IN MY OPINION. I GREW UP IN ALBANY, AND THE RIVER IS CLEANER TODAY THAN IT HAS BEEN IN MY LIFETIME. BUT IT IS NOT ENOUGH. I WOULD LIKE TO SEE FURTHER WORK DONE HERE TO ENSURE THE FUTURE SUSTAINABILITY OF THIS AREA FOR HUMAN BEINGS TO LIVE, GROW, AND PROSPER IN. I WATCH FAMILIES THAT DON'T KNOW ANY BETTER PULL FISH FROM THIS RIVER TO FEED THEIR FAMILIES. DO NOT STOP THE REMEDIATION PROCESS HERE. IT MAY BE THIS AREAS ONLY HOPE AT HAVING A FUTURE AT ALL. THE DISEASE THAT IS APPARENT IN THE LOCAL POPULATION HERE DUE TO THIS CONTAMINATION ARE BLATANTLY APPARENT TO ANYONE WHO HAS EVER SEEN AN ENVIRONMENT WITH PEOPLE THRIVING THAT DOES NOT HAVE THIS ISSUE. THESE ARE REAL LIVE HUMAN BEINGS THIS IS AFFECTING. THESE ARE MY FRIENDS, AND MY FAMILY, AND THE TOWN I LOVE TO CALL MY HOME EVEN THOUGH I HAVE TRAVELED AND WORKED INTENSIVELY IN OTHER STATES AND AREAS WITHOUT THESE ISSUES. DO NOT TURN YOUR BACK ON THESE PEOPLE. THEY DESERVE YOUR PROTECTION AND SUPPORT.

Sincerely,

KATHERINE ENBERG  
[REDACTED]  
[REDACTED]  
[REDACTED]

# Protect people and wildlife, not GE

Cory Ethridge [REDACTED]

Thu 8/10/2017 9:02 PM

To: Gary Klawinski, Project Director, EPA <epahrfo@outlook.com>;

Aug 10, 2017

Mr. Gary Klawinski, Project Director, EPA  
US EPA Hudson River Field Office, Region 2, [187 Wolf Road, Suite 303  
Albany, NY 12205](#)

Dear Mr. Klawinski, Project Director, EPA,

As a longtime Hudson Valley resident who loves the river, I have the following comments on the U.S. Environmental Protection Agency's (EPA's) Proposed Second Five-Year Review Report for the Hudson River PCBs Superfund Site. Most of the comment below is drafted by Riverkeeper, an organization I strongly support. The details of it are deeply disturbing to me. GE polluted this beautiful, important and valuable river to the point where it was virtually non-functioning as a river, and they are responsible for the total cleanup of the PCBs they put in the river. As a resident of the Hudson Valley and frequent kayaker, I demand that GE be held accountable for its actions and that the cleanup of the river continue. Please note that I agree with, understand and am firmly behind all of Riverkeeper's information outlined below.

Cory Ethridge  
[REDACTED]

In summary: The Hudson is a critical resource. The PCB cleanup is not protective of human health and the environment because it is not performing as planned. You must order more dredging in the Upper Hudson River, and we need a remedial investigation/feasibility study in the Lower Hudson River as soon as possible.

EPA's review must clearly state "the remedy is not protective." In the report you admit that General Electric's (GE's) cleanup of toxic PCBs it dumped in the Hudson River does not currently protect the health of the public or the river. That should be the only finding of the report. And you must remove the phrase "the remedy will be protective." Such a statement conflicts with your agency's admissions that the cleanup is not protective now, that at least eight more years of data are needed to predict future trends with any confidence, that the short-term 5-year fish tissue goal will not be met, and that more investigation is needed in the lower 150 miles.

The Hudson River is a critical resource. The economic, recreational, cultural, and scenic value of the River form the bedrock of past

development and future vitality for the Hudson Valley and New York City. Because GE dumped over a million pounds of toxic PCBs into Hudson River from 1947 to 1977, a once vibrant commercial fishing industry has been closed down, the River has become one of the nation's largest Superfund sites, and the ability of people to consume fish from the river has been significantly restricted. As demonstrated by the public outcry at EPA's information meetings on its Five-Year Review Report, New Yorkers want a healthy Hudson River as soon as possible.

The goals that EPA set to clean up the Hudson River are already weak. In the Upper Hudson River--the 40 miles north of the Federal Dam in Troy, NY--EPA expected that within 5 years of the completion of dredging, it would only be safe to eat one fish meal every two months, and that within 16 years, it would only be safe to eat one fish meal per month. Under the cleanup plan, EPA did not expect people to be able to eat one fish meal per week for over 55 years. Because the timelines for the cleanup are so long, I expect EPA to hold GE accountable for meeting -- and not simply move the goal posts. In the meantime, I am concerned about the many people who eat fish from the Hudson River, and I urge EPA to do better outreach to subsistence and recreational fishing communities about the health risks.

There is already evidence that the cleanup will fail to meet the goals for the Upper Hudson River. Dredging was completed in 2015, and according to fish tissue data from 2016, the average concentration in the Upper Hudson River is 1.3 mg/kg. With concentrations at that level, it is almost certain that the 5-year goal of 0.4 mg/kg will not be met. Even assuming an 8% "decay rate," which is optimistic, the cleanup will miss this goal by more than 10 years. EPA should acknowledge in the report that the cleanup will very likely fail to meet this critical short-term goal, and then order GE to develop a plan of action, including more dredging if necessary, to get the cleanup back on track.

EPA's determination that the cleanup "will be protective" of human health and the environment for the Upper Hudson River is not acceptable. This determination is inconsistent with the agency's admission that the cleanup is currently not protective and with EPA's repeated statements that at least eight more years of data are needed to predict future trends with any confidence. EPA's determination is further undercut by the agency's reluctance to provide specific timeframes for reaching the short- and long-term goals. In addition, the National Oceanic and Atmospheric Administration (NOAA) recently published a peer-reviewed study suggesting that hazardous levels of PCBs will remain in fish in the Lower Hudson River for much longer than the EPA predicts. The New York State Department of Environmental Conservation (NYSDEC) has also expressed its concerns with the findings in the report, stating that the significant amount of contamination left in the river threatens both the public health and the environment. Therefore, EPA should revise its determination and recognize that the cleanup is not protective of human health and the environment.

The data show that the Lower Hudson River--the 150 miles south of the Federal Dam--is not responding as anticipated. EPA essentially admits that the cleanup is not working in the Lower Hudson River by failing to make a protectiveness determination that covers this stretch. From Poughkeepsie and continuing downstream, the decay rates (or rate of

decrease in PCB concentration) in fish are not statistically different from zero. NYSDEC and the Hudson River Foundation do not expect the dredging to result in additional improvement in the Lower Hudson River. While EPA agrees that more investigation is needed, the agency has made no definite plans on how this will be done. Therefore, I urge EPA to require GE to do a full remedial investigation and feasibility study of the Lower Hudson River.

EPA should be more up front about the facts in its Five-Year Review Report. For instance, during Phase 1 of dredging, EPA discovered that it had underestimated both the depth of the PCB contamination and the concentration of PCBs in the surface sediment. Despite acknowledging that there were more PCBs present, EPA did not change the goals for the cleanup. Instead, EPA focused on removing a certain percentage of contaminated sediment, leaving behind two to three times more PCBs than anticipated. NOAA has stated that this means that cleanup goals targets will be met up to 60 years later than expected. The public has a right to know how much PCB contamination remains in the River today, and I hope that EPA will make that information clear and accessible in its final report.

In short, EPA is hiding the ball. For the Upper Hudson River, EPA has failed to evaluate all of the signs that the cleanup will not meet its goals, and instead made a determination based on hope rather than science. For the Lower Hudson River, EPA has recognized that the cleanup is not working as anticipated, but it has failed to provide a plan for a prompt investigation and cleanup. If Administrator Pruitt's words about doing Superfund better and faster mean anything, they should cause EPA to make a "not protective" finding for the entire Hudson River Superfund Site, order GE to take more PCBs out of the Upper Hudson River, and compel GE to put its imagination to work devising a cleanup for the Lower Hudson River.

Thank you for the opportunity to submit my comments.

Sincerely,

Ms. Cory Ethridge

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

# General Electric and cleaning the Hudson

Mary Evans [REDACTED]

Wed 8/30/2017 5:45 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

To Whom It May Concern,

As a resident of the Hudson Valley, a taxpayer and owner of a small business, I am writing to emphasize how important it is that GE NOT get away with poisoning our great river and they must continue to clean up right away the horrible, toxic, chemical mess they left in the Hudson. They are a hugely profitable corporation, and have the means to make good on the court order.

Don't have "might make right" and absolve GE from its duty to American citizens to clean up the mess they made, and clean it up NOW!

Onward,  
Mary Evans

[REDACTED]



This email has been checked for viruses by Avast antivirus software.

[www.avast.com](http://www.avast.com)

FW: More PCBs need to be cleaned up on the Hudson R.

Klawinski, Gary J <Klawinski.Gary@epa.gov>

Tue 8/15/2017 3:09 PM

To: Public Comment Hudson 2nd FYR (epahrfo@outlook.com) <epahrfo@outlook.com>;

Cc: Romanowski, Larisa <Romanowski.Larisa@epa.gov>;

From: Russell Faller [REDACTED]  
Sent: Wednesday, June 21, 2017 9:50 PM  
To: Klawinski, Gary J <Klawinski.Gary@epa.gov>  
Subject: More PCBs need to be cleaned up on the Hudson R.

Dear Gary Klawinski,

The job is not done. More cleaning up of the Hudson River by GE is needed.

Your own EPA admits that, south of Troy, the Hudson is not seeing any benefits from GE's dredging.

Your own EPA has ignored expert science by NOAA, NYS Dept. of Environmental Conservation and the Hudson River Foundation all concluding that the Hudson will not recover for many decades under your EPA goals.

I paddle the Hudson frequently. I do not want to be exposed to PCBs in the air, water and sediment for at least another century. That is, assuming that it's somehow possible for me to live to 173 years old!

More PCB cleaning up of this largest toxic Superfund site, the Hudson River, is clearing needed.

Please protect the people of the Hudson Valley - not GE.

Thank you for considering my concerns.

Russell Faller  
[REDACTED]

# FW: GE needs to finish its job cleaning PCBs from the ZHudson River

Klawinski, Gary J <Klawinski.Gary@epa.gov>

Tue 8/15/2017 3:07 PM

To: Public Comment Hudson 2nd FYR (epahrfo@outlook.com) <epahrfo@outlook.com>;

Cc: Romanowski, Larisa <Romanowski.Larisa@epa.gov>;

From: Russell Faller [REDACTED]  
Sent: Tuesday, June 27, 2017 10:35 PM  
To: Klawinski, Gary J <Klawinski.Gary@epa.gov>  
Cc: Prui, Sc o <Pru.Sc o@epa.gov>  
Subject: GE needs to finish its job cleaning PCBs from the ZHudson River

Dear Gary Klawinski & Scott Pruitt,

Your own agency admits that the part of the Hudson River south of Troy, NY, is not seeing any benefits from GE's dredging. There are now 2 to 3 times more PCBs left in the river than expected.

The EPA has ignored expert science by NOAA, the NY State Department of Environmental Conservation and the Hudson River Foundation, who have all concluded that the Hudson will not recover for many decades under your clean-up goals.

I paddle the Hudson often. I do not want to continue being exposed to PCBs in the air, water and sediment.

More PCB cleaning up is clearly needed. Protect the people not GE!

Thank you for considering my concerns. I pray you'll do the right thing.

Russell Faller  
[REDACTED]



Dear Director Klawinski,

I FEEL VERY STRONGLY THAT THE EPA'S  
DECISION ON CLEANING THE PCBs FROM THE  
HUDSON RIVER IS ABSOLUTELY WRONG. YOU  
CONCLUDED THAT IT'S ACCEPTABLE THAT IN 50  
YRS., OR MORE, WE WILL BE ABLE TO EAT 1 FISH MEAL  
A WEEK W/O GETTING SICK. THIS IS NOT ACCEPTABLE  
TO ME, GE MUST DO MORE CLEANING.

Sincerely,

Name: RUSSELL FALLER

Address:

E-mail:



**SCENIC  
HUDSON**

[scenichudson.org/pcbs](http://scenichudson.org/pcbs) [riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)



**RIVERKEEPER**  
NY's clean water advocate

# #HealthyHudson

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MAILED FROM ZIP CODE 12601

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PITNEY BOWES

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# FW: Hudson River Site Five-Year Review (DBON-AN2FXZ, PAD No. 17-64, RPL No.171121)

Romanowski, Larisa <Romanowski.Larisa@epa.gov>

Mon 6/5/2017 1:38 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

---

From: Zachos, George  
Sent: Monday, June 05, 2017 9:55 AM  
To: armanda007@gmail.com  
Subject: Hudson River Site Five-Year Review (DBON-AN2FXZ, PAD No. 17-64, RPL No.171121)

Good Morning Ms. Famiglietti,

Thank you for your correspondence!

Your e-mail below sent yesterday (Sunday) afternoon was forwarded to this Office this morning (June 5) for response.

Submitted on 06/04/2017 1:43PM

Submitted values are:

Name: Armanda Famiglietti

Email: [REDACTED]

Comments: Re: EPA draft of second five-year review of the the Hudson River Superfund site I am a citizen and a voter living in the Hudson Valley. The EPA should finish what it started, expand protections for human health and the environment not limit them. Hazardous substances, pollutants, or contaminants remain and exceed safe level -- that is unacceptable. EPA do your job. "... natural attenuation following the completion of dredging will achieve the long-term remediation" is not good enough for the families and wildlife living in the SuperFund site. Armanda Famiglietti, [REDACTED]

EPA's proposed Five Year Review report for the Hudson River PCBs Superfund site was released on June 1 for a 30-day public comment period. Your comments will be considered along with others we receive during this time.

Thank you!

Have a nice day,

George

George H. Zachos  
Office of the Director  
Accelerated Cleanup Manager and Regional Public Liaison (formerly Superfund Ombudsman)  
[732-321-6621; toll-free, 1-888-BUDSMAN (283-7626)]

George H. Zachos  
Office of the Director  
Accelerated Cleanup Manager and Regional Public Liaison (formerly Superfund Ombudsman)  
[732-321-6621; toll-free, 1-888-BUDSMAN (283-7626)]

# More dredging is needed for the Hudson

Peter Farrell [REDACTED]

Mon 8/21/2017 11:28 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

im an avid outdoorsman and fisherman and the EPA and GE should continue to dredge the Hudson to remove as much pcb's as possible. It is there moral responsibility.

Sincerely,

Peter j farrell

[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Nina Faver [REDACTED]

Mon 8/21/2017 4:50 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

The Hudson River is a beautiful sight to see - when I'm taking a walk along the riverside, when I'm riding a MetroNorth train into NYC, when I'm driving across the Bear Mountain or Tappan Zee Bridges... But its value lures in a great deal more than its aesthetic beauty. It's economic and its environmental value is paramount.

Efforts to clean the river must be completed!

Current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected. This is completely unacceptable.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Nina Faber  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

have some courage, ethics  
and responsibility and  
do what is right for  
'we the people', we the majority  
that care and want a clean environment  
and stop supporting billionair capitalist  
THEY CAN AFFORD TO keep  
a clean environment !!!

Sincerely,

Name:

Nancy Felcetto

Address:

E-mail:



**SCENIC HUDSON**

scenichudson.org/pcbs riverkeeper.org/pcbs



**RIVERKEEPER**  
NY's clean water

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# #HealthyHudson

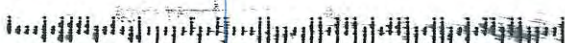
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Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205





Dear Director Klawinski,

PLEASE! THE Healthier OUR ENVIRONMENT  
is, THE more Profitable it is.  
CLEAN up THE HUDSON RIVER  
FROM PCB'S and ALL TOXIC Contaminants.  
OUR ECONOMY Depends ON it.

Sincerely,

Name:

ROY FELCETTO

Address:

E-mail:



**SCENIC HUDSON**

scenichudson.org/pcbs riverkeeper.org/pcbs



**RIVERKEEPER**

NY's clean water advocate

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# #HealthyHudson

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AUG 29 2017

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

Dear Director Klawinski,

The Hudson River Cleanup is  
not protective. EPA must remove  
from the report "the remedy will be  
protective"

Thank you!

Sincerely,

Name:

Deborah Felder

Address:

[Redacted]

E-mail:

[Redacted]@ [Redacted]

[Redacted]



scenichudson.org/pcbs riverkeeper.org/pcbs



# #HealthyHudson

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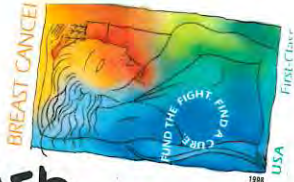


Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

205-113878



Dear Director Klawinski,



GE is required to finish  
cleaning up the mess they created.  
The future of our children, communities  
and the Hudson River demand it!  
Uphold the agreement and get the job  
DONE!

Sincerely,

Name: Ricardo Fernandez

Address: [REDACTED]

E-mail: [REDACTED]



[scenichudson.org/pcbs](http://scenichudson.org/pcbs) [riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)



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# #HealthyHudson

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

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AUG 22 2017



# GE/PCBs and the Hudson River

Linda Fernberg [REDACTED]

Fri 8/25/2017 11:58 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Mr. Klawinski,

I implore the EPA to compel GE to continue to clean up the Hudson River.

What has been done so far is a start, but should not be the end.

I am 56 years old and the river has never been clean in my lifetime. That's quite a statement. It shows both the lack of will by GE to be a good neighbor and clean up its mess and the reluctance of the EPA to truly hold GE's feet to the fire. GE is a multi-billion dollar company, they can afford to clean up their mess!

Do the right thing for New Yorkers, New Jersians and the Hudson River itself and demand GE finish the job, and properly!

Clean up the PCBs and make the Hudson River clear and clean!

Linda A. Fernberg  
[REDACTED]  
[REDACTED]

# Protect people and wildlife, not GE

Elvira Ferrario [REDACTED]

Wed 8/16/2017 12:20 PM

To: Gary Klawinski, Project Director, EPA <epahrfo@outlook.com>;

Aug 16, 2017

Mr. Gary Klawinski, Project Director, EPA  
US EPA Hudson River Field Office, Region 2, [187 Wolf Road, Suite 303  
Albany, NY 12205](#)

Dear Mr. Klawinski, Project Director, EPA,

My comment on the EPA's Report for the Hudson River PCBs Superfund Site:

The PCB cleanup is not protective of human health and the environment because it is not performing as planned. You must order more dredging in the Upper Hudson River.

Also, do a feasibility study in the Lower Hudson River as soon as possible.

EPA's review must clearly state "the remedy is not protective" and you must remove the phrase "the remedy will be protective."

The Hudson River is a critical resource.

GE has dumped over a million pounds of toxic PCBs into Hudson River from 1947 to 1977, to the point that the river has become one of the nation's largest Superfund sites. New Yorkers want a healthy Hudson River!

There is already evidence that the cleanup will fail to meet the goals for the Upper Hudson River. Dredging was completed in 2015, and according to fish tissue data from 2016, the average concentration in the Upper Hudson River is 1.3 mg/kg. With concentrations at that level, it is almost certain that the 5-year goal of 0.4 mg/kg will not be met. Even assuming an 8% "decay rate," which is optimistic, the cleanup will miss this goal by more than 10 years. EPA should acknowledge in the report that the cleanup will very likely fail to meet this critical short-term goal, and then order GE to develop a plan of action, including more dredging if necessary, to get the cleanup back on track.

Thank you for the opportunity to submit my comments.

Sincerely,

Ms. Elvira Ferrario  
[REDACTED]  
[REDACTED]



[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Mary Fetherolf [REDACTED]

Mon 8/21/2017 3:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I'm a resident of Beacon NY, and I vote! I grew up in the Hudson Valley.

For decades, GE's plants dumped toxic waste into the Hudson River. Now the EPA is saying GE doesn't have to finish cleaning up its mess?! The EPA's preliminary findings state that in 50 years people will be able to eat ONE FISH A WEEK from the Hudson and not get sick. And that's good enough for GE and the EPA.

As it stands, state and federal scientists DO NOT AGREE with the draft of your report. Please consider, which side of history do you want to be on?

EPA must tell the truth, as it is charged to do. Remove from the report any statement that the proposed remedy is protective - it isn't!

EPA must insist that GE provide sufficient cleanup. Any solution must include more dredging in the upper river, and initiate a remedial investigation and feasibility study in the lower 150 miles of our Hudson River.

Sincerely,

Mary Fetherolf  
[REDACTED]  
[REDACTED]  
[REDACTED]

Joe Finan



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August 30, 2017

Gary Klawinski  
Hudson River Field Office  
187 Wolf Road, Suite 303  
Albany, NY 12205

Dear Gary;

As you are aware I served as an employee of Saratoga National Historical Park from 1989 until my retirement in 2015. I am a resident of the Town of Easton and have served on the town planning Board for 16 years. I have also served in my employment capacity as a member of the NRDA Public Communication Technical Working Group and the Cultural Resource Advisory Group for this project. I have attended numerous meetings relating to the various elements of the Remediation Project. Over that period, I have experienced first-hand the challenges faced by this Federal Undertaking.

Based on my observations and understanding of the original objectives of the ROD it is clear, that the remedy has not been protective of the long term or even immediate health of our river or its inhabitants. The health and economic viability of river front communities continues to be compromised as a result of PCB contamination of the river, associated wetlands and floodplains. Restrictions on the use of the river from fish consumption and swimming to the use of the Champlain Canal by recreational and commercial vessels have impacted the health and well-being of Upper Hudson River communities. These restrictions constitute a "Taking" and real loss of revenue for these communities and a higher cost to do revitalization. The communities of the Upper Hudson River look forward to our grandchildren capitalizing on continued agricultural productions, outdoor recreation and heritage, agricultural tourism that America's Historic River has to offer. This type of revitalization will compliment recent technology park developments in the Capital Region. Existing PCB contamination is a serious threat to our ability to fulfill these visions.

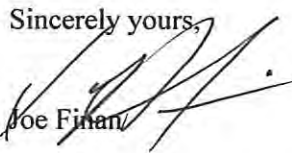
In response to the Five-Year Review Questions:

1. Is the remedy functioning as intended by the decision documents? NO
  - a. It is clear from the initial information on habitat and fish samples that it is taking longer for recovery than anticipated. PCB's were far deeper and more dispersed than the ROD anticipated.
  - b. Habitat reconstruction has not resulted in repopulation of species within the parameters that the ROD anticipated.
  - c. Resuspension and down river redistribution of sediments into the flood plains has not been addressed.
  
2. Are the exposure assumptions, toxicity, data, cleanup levels, and remedial actions objectives used at the time of the remedy selection still valid? NO
  - a. The variability of testing methods has tainted the results to date. The initial assessment of the breadth and depth of contamination failed to accurately estimate the volume of contaminants and their distribution. As a result, the modeling used for remedial action was flawed.

- b. The ROD left behind significant deposits throughout the upper Hudson that are not part of the cleanup. Those deposits are in excess of standards used in other PCB cleanup projects and leave our river subject to additional cleanup costs every time we attempt a project – whether residential or public.
  - c. Without data on the level, depth and breadth of contamination of the floodplain this review is fragmented and ill informed. As monitoring reflected during dredging there were numerous occasions of resuspension of PCB's exceed performance standards often near shore and adjacent to the floodplain. In addition, no assessment of the impacts associated with compliance with the NYS Constitutional requirements of the NYS Canal System and the need for operational dredging of Champlain Canal has been considered or presented.
3. Has any other information come to light that could call into question the protectiveness of the remedy? MOST DEFINITELY YES
- a. The original Champlain Canal was not included in the remedy and it is hydrologically part of the Hudson River. Significant PCB concentrations were found and partially removed from the canal north of Lock 5, yet the original canal was ignored. The historic canal is now so silted in with blocked culverts and dead fall that it is often stagnant and overflows the banks during heavy storms.
  - b. The ROD ignored the industrial and recreational use of the river when it required dredging only to the depth of the contamination – ignoring the fact that New York State has been unable to dredge to required depths for decades. Additionally, the EPA (with the ROD as an excuse) refilled areas that had silted in over the decades – impeding industrial and recreational use.
  - c. The ROD focused on river sections closer to Fort Edward, ignoring contamination of the same toxicity in river sections below Lock 5. Those areas will continue to redeposit PCB's in the upper river, the flood plains and the lower river.
  - d. The NYS Canal System has been designated a National Register Property the ability to perform both operational and preventative maintenance on this Nationally significant resource has been compromised impacting the integrity of the infrastructure.

For these reasons – I urge the EPA to recognize that the remedy as designed is not protective. Additional dredging and floodplain remediation is required if those of us in the upper Hudson are to have a clean and economically sustainable river. We cannot undertake projects and use our river with the knowledge that the legacy of PCB's is still lurking in the sediments, floodplains and canal infrastructure.

Sincerely yours,

  
Joe Finan

J. FINAN



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JAN 20 2011

GARY KLAWINSKI  
HUDSON RIVER FIELD OFFICE  
187 WOLF ROAD, SUITE 303  
ALBANY, NY 12205

12205-11987B



Dear Director Klawinski,

Please continue to clean up the Hudson River. Do not let GE get away with any more delays. A lot more clean up is necessary. Despite any federal cuts to the EPA, you must continue to clean up the river.

Sincerely,

Name: Margaret "Julie" Finch

Address:

E-mail:



scenichudson.org/pcbs riverkeeper.org/pcbs



# #HealthyHudson

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AUG 01 2017



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# EPA Second Draft Year Review

Rebecca Finnell [REDACTED]

Wed 8/30/2017 3:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I have lived along the Lower Hudson for more than 30 years and have long hoped for a proper clean-up of PCBs from the river. Thus I was distressed to learn that the EPA's latest, draft report expresses satisfaction with the dredging to date. The dredging has not been protective. In fact, PCBs remain a significant problem in the river, especially downriver from the hot spots (where contamination was far worse than originally estimated). If the EPA is to live up to the word "protection" in its name, the agency should insist that clean-up continue. More dredging is required, as well as more studies to monitor the status of fish populations in the river -- upper, mid, and lower regions.

Please do the right thing by the river and the organisms, human and otherwise, that depend on it.

Sincerely, Rebecca Finnell

Sincerely,

Rebecca Finnell  
[REDACTED]  
[REDACTED]  
[REDACTED]



# EPA Second Draft Year Review

John Fisher [REDACTED]

Mon 8/21/2017 4:50 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am a 30-year resident of Orange and Dutchess Counties. I am very concerned that EPA intends to allow GE to discontinue dredging in the Upper Hudson, because current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. We need more not less removal!

I understand that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered- after the remedy was determined- that there was more contamination than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Residents of my area deserve a river that is truly safe from PCB contamination, with fish and recreational activity we and our children can safely enjoy.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Your agency's mandate is to enforce environmental laws and regulations, not let Corporations off the hook for damage they have done to our great natural resources! I hope you fully satisfy your responsibility in this matter!

Sincerely,

Sincerely,  
[REDACTED]  
[REDACTED]  
[REDACTED]

*Saratoga Public Meeting*

**COMMENT SHEET — 2017 Five Year Review Report**  
**Hudson River PCBs Superfund Site**

Name (Please Print): LYNN FLANAGAN

Agency/Organization:

Address: [REDACTED]

Written comments must be postmarked by September 1, 2017 [REDACTED]

COMMENTS:

MORE WORK IS NEEDED TO ENSURE  
THE RESTORATION OF A HEALTHY  
HUDSON RIVER. LOW-INCOME NEW YORKERS ARE  
SUPPLEMENTING THEIR DIETS WITH FISH FROM RIVER.  
ADDITIONAL BREEDINGS OF THE NORTH  
HUDSON ARE NECESSARY. NATURAL ATTENUATION  
WILL TAKE TOO LONG + ENDANGER MANY.  
THANK YOU

Written Comments can be sent by mail or email to:

Gary Klawinski, Director  
EPA Region 2, Hudson River Office  
187 Wolf Road, Suite 303  
Albany, NY 12205  
email: epahrfo@outlook.com

# EPA Second Draft Year Review

Peter Flanagan [REDACTED]

Fri 9/1/2017 3:22 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I live near and fish on the Hudson River regularly. I have seen the results of a cleaner river, and in and around NYC the difference in just the last 10 years has been positive. Upriver we need to see the same results; please fight to continue to implement a remedy that is truly protective. We need the PCBs that reside in the Hudson removed completely and General Electric needs to continue to be held responsible.

And because the lower Hudson appears to be cleaner to my eye it doesn't mean that the water is actually clean. Further investigation is needed.

I voted for the current Administration but I am appalled by their environmental policies. Please, let's keep New York State clean and healthy. Thank you,

Sincerely,

Peter Flanagan  
[REDACTED]  
[REDACTED]  
[REDACTED]

**COMMENT SHEET — 2017 Five Year Review Report**  
**Hudson River PCBs Superfund Site**

Name (Please Print): KRISTIN FLOOD

Agency/Organization: \_\_\_\_\_

Address: \_\_\_\_\_

*Written comments must be postmarked by September 1, 2017*

COMMENTS:

Re the GE "cleanup:" I urge you to conclude it is "NOT PROTECTIVE" period. It is NOT. More PCB's have been identified and some have moved. This is an additional subject that needs to be addressed.

Your job is to ~~clean~~ make sure the superfund site is remediated, to CLEAN UP THE RIVER. It is way more than hiding within an agreement that was reached in 2002. The key thing is "what's next?" We CANNOT wait 55 years to answer that question. A new agreement needs to be established; NEW efforts need to be initiated. Don't live in the past. It is the future we care about and depend upon.

*Written Comments can be sent by mail or email to:*

Gary Klawinski, Director  
EPA Region 2, Hudson River Office  
187 Wolf Road, Suite 303  
Albany, NY 12205  
email: epahrfo@outlook.com

FLOOD



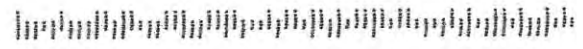
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GARY KLAWINSKI, PROJECT DIRECTOR  
EPA REGION 2, HUDSON RIVER OFFICE  
187 WOLF ROAD - SUITE 303  
ALBANY, NY 12205

12205-119878



# More dredging is needed for the Hudson

Patricia Flood [REDACTED]

Mon 8/21/2017 3:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

My name is Patricia Flood. I have lived in the Hudson Valley my entire life. My father had a sailboat and we traveled the length and breadth of the river from Albany to the Sound.

GE polluted the Hudson for years. They should be made responsible for the damage. The current measures being proposed are not strong enough. The report must state that the remedy is not protective. It doesn't go far enough.

I'm sure you've heard all of the Key Points which don't need repeating here. Please be sure that our river is not only protected, but GE is held accountable for the damage they have caused.

Thank you,

Patricia Flood

Sincerely,

Patricia Flood  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

I AM WORRIED ABOUT WATER QUALITY  
IN THE HUDSON. I WANT GE TO FINISH  
THE JOB AND FULLY CLEAN IT UP!

Sincerely,

Name: CRAIG FOGEL

Address:

E-mail:



scenichudson.org/pcbs



NY's clean water advocate

riverkeeper.org/pcbs

# #HealthyHudson

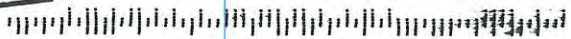
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Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

205-113878





Bob & Marie Foster

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AUG 31 2017

August 28, 2017

Mr. Gary Klawinski  
U S Environmental Protection Agency  
Hudson River Field Office  
187 Wolf Road, Suite 303  
Albany, NY 12205

Dear Mr. Klawinski:

As you can see from the above address, we live between the Hudson River and the old Champlain Canal. I suppose you can say we are in the center of the controversy! Our comments today are in response to your request for public input as called for in the review process for the PCBs removal and remediation work covering the Hudson River Superfund Site. While we strongly feel that a great amount of work took place that is beneficial to river system, it does seem that work remains to be done before the agency can categorize the project as successful and complete.

The record of decision never included the flood plain areas that are so accessible to human exposure. The river's edge where people sit, walk pets, fish from and a variety of other activities, see flooding, often on an annual basis. A major source of this type of flooding is a section of the original Champlain Canal which still exist running north-south through the Town of Saratoga and Village of Schuylerville from the area just adjacent to today's Champlain Canal/Hudson River at Lock C5 down to Fish Creek. Surely this was a gross oversight as the old canal is indisputably hydraulically linked to the Hudson River above Lock C5.

The problem in a nutshell is that because of restrictions placed on canal maintenance by the EPA, various state, county and local municipal agencies, including willing volunteer groups that could address canal siltation, treefall removals, canal embankment stabilization and debris removal, all such actions are held hostage to

2.

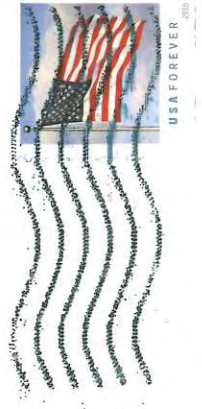
the opinion that the old canal has PCB contamination and therefore cannot be safely maintained. The extreme irony is that when inquiries are made to define the level or location of the contamination none can be produced. The end panel to this comic strip is that our local governments and/or willing volunteers cannot proceed with important maintenance work to a very visible community waterway because of the perceived possibility of superfund level contamination. The result after many years in this untenable bind is that the original canal has turned into a linear swamp, filled with debris, treefalls and less than half of its original depth because of siltation which directly contributes to excessive bank overruns during heavy rains. This of course carries bottom silt into adjacent yards and recreational fields used by many children throughout the year.

At an absolute minimum the US EPA should conduct a thorough survey of the contamination levels in the old canal and based on the findings either complete the superfund remediation work or release the information that will allow local governments and volunteers to be able to begin restoration of the canal as a vital attribute and working as an important part of our storm water runoff system.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bob & Marie Foster". The signature is stylized and cursive, with a long horizontal line extending from the left side across the middle of the text.

Bob & Marie Foster



ALBANY NY 120

24 JUL 2017 PMS 51

EPA Hudson River Field Office  
187 Wolf Rd., Suite 303  
Albany, NY 12205

July 24, 2017

EPA Hudson River Field Office -

Re. the Hudson River PCB Cleanup, I hope you realize that the demands of

- Scenic Hudson
- Riverkeepers
- NYS DEC

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JUL 27 2017

will always continue & never be satisfied no matter what the EPA does for them. It is the nature of the environmentalists that something more should/ can always be done.

Please do not cave in to these groups & put an end to this nonsense.  
Marion Foster

Dear Director Klawinski,

Let's create a Healthy Sustainable  
Hudson River. Have GE continue  
the clean-up that they promised.  
Current research shows that they  
left 2x as many PCBs. The clean-  
up of this Super Fund is vital for  
economic & environmental  
reasons.

Sincerely,

Name:

Tiffani Francisco

Address:

[Redacted Address]

E-mail:

[Redacted Email]



**SCENIC HUDSON**

scenichudson.org/pcbs riverkeeper.org/pcbs



**RIVERKEEPER**  
NY's clean water advocate

# #HealthyHudson

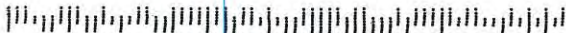
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MAILED FROM ZIP CODE 12601



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



Dear Director Klawinski,

I am a sailor and as a sailor I  
would love for the Hudson to be  
clean. I am [redacted] and we have  
a yacht club in Riverdale and I fall  
in the river sometimes. ~~It~~ It is  
important that the river is clean so I stay  
safe/healthy.

Sincerely, |

Name: Marcus Frank

Address: [redacted]

E-mail: [redacted]



**SCENIC  
HUDSON**

[scenichudson.org/pcbs](http://scenichudson.org/pcbs) [riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)



**RIVERKEEPER**  
NY's clean water advocate

WESTCHESTER NY 105

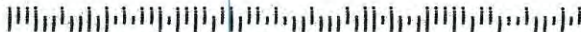
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# #HealthyHudson

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SEP 06 2017

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# More dredging is needed for the Hudson

Florence Joan Freeman [REDACTED]

Mon 8/21/2017 11:36 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am a resident of New Hamburg, NY. Having a home on the Hudson River makes me even more sensitive to our the need to preserve and protect this great waterway. In the upcoming Five Year Technical Review of the river cleanup, and with respect to dredging by GE - your report must state that the remedy so far is not protective. We need continued dredging and/or cleanup to finish the job!

Sincerely,  
Joan Freeman

Sincerely,

Florence Joan Freeman , New Hamburg NY

[REDACTED]  
[REDACTED]  
[REDACTED]



# FW: Hudson River Clean-up

Klawinski, Gary J <Klawinski.Gary@epa.gov>

Wed 9/6/2017 9:41 AM

To: 'epahrfo@outlook.com' <epahrfo@outlook.com>;

---

From: Linda & Chester [REDACTED]  
Sent: Friday, August 18, 2017 2:41 PM  
To: Klawinski, Gary J <Klawinski.Gary@epa.gov>  
Cc: info@riverkeeper.org; Prui, Sc o <Prui.Sc o@epa.gov>  
Subject: Hudson River Clean-up

Hello, Mr. Klawinski,

I am writing to urge the EPA to officially say the clean-up of the Hudson River is not protective, not complete, and that more work is needed to ensure a healthy Hudson River. EPA's own data shows that south of the Troy Dam, all the way to Manhattan, PCB concentrations in fish haven't declined as expected. We cannot declare the clean-up of the Hudson River complete until the PCB contamination in the entire river reaches a level that does not threaten human health and the environment.

Thank you.

Linda & Chester Freeman

[REDACTED]

Dear Director Klawinski,

Please make GE finish the  
remediation of the pollution of  
the Hudson River. I live on the  
Hudson and GE needs to make  
right the damage they caused

Sincerely,

Name: Kate Frizzell

Address:

E-mail:



scenichudson.org/pcbs



RIVERKEEPER  
NY's clean water advocate

riverkeeper.org/pcbs

ALBANY NY 1220

THE VALUE OF CLEAN WATER



# #HealthyHudson

Gary Klawinski

Director, Hudson River Field Office

U.S. Environmental Protection Agency

187 Wolf Road, Suite 303

Albany, NY 12205

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AUG 29 2017



# More dredging is needed for the Hudson

Sharon Gagne [REDACTED]

Mon 8/21/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I have lived within 4 miles of the Hudson River for 67 years both swimming as a child and kayaking as an adult.

I am so disappointed in the EPA and our state government for ending GE's PCB clean-up prior to restoring health to the river. This is NOT protecting the citizen's health or the river's health. If we cannot safely eat the fish or crabs from the river, how can you say the remedy will be protective when it is not?

I am asking that the dredging of PCB's continue at the very least because it has been determined that there are significantly higher levels of toxicity than planned for in the original plan. It must be adjusted to be effective.

The citizenry is not asking for the impossible—only that our river be restored to the condition it was prior to GE's dumping. Both the NYS and the EPA seem to have much explaining to do if this process is halted before it reaches its stated goal of protecting our health!

Sincerely,

Sharon Gagne  
[REDACTED]  
[REDACTED]  
[REDACTED]

# Protect our river and the life in it

Gai Galitzine [REDACTED]

Tue 8/29/2017 9:42 AM

To: Gary Klawinski, Project Director, EPA <epahrfo@outlook.com>;

Aug 29, 2017

Mr. Gary Klawinski, Project Director, EPA  
US EPA Hudson River Field Office, Region 2, 187 Wolf Road, Suite 303  
Albany, NY 12205

Dear Mr. Klawinski, Project Director, EPA,

Please do more to protect our beloved Hudson. Having lived by the Hudson since coming to this country over 40 years ago I have watched the fight to clean it up. It is not over. We need more data from the lower Hudson and GE's clean up is not sufficient in the higher reaches.

Ever since I first saw the Hudson I was astonished by its beauty, looking out over the Palisades where if you closed your ears to the Manhattan noise you could imagine yourself in a canoe 300 years ago. We cant get that back, but we can and must restore what is possible. It is in your hands, it is your responsibility - do the right thing.

Thank you.

Sincerely,

Mrs. Gai Galitzine  
51 Glen St

[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Nancy Gardner [REDACTED]

Mon 8/21/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Please, don't leave us and our kids and grandchildren with a toxic mess!

Sincerely,

Nancy Noble Gardner

[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Linda Geary [REDACTED]

Mon 8/21/2017 3:30 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I have lived along the Hudson River nearly all my life. Growing up in Catskill in the 1960's I remember everyone wrote off the river as a sewer--- because of the PCB's, and other pollutants such as sewage discharge. A lot has changed thanks to the EPA enforcing environmental laws- and that is what must be done fully here regarding the PCB removal. It is America's river, yes, but it was a fishing, swimming, boating river for generations of Americans and the PCBs must be removed so that the PCB's don't continue to contaminate the river.

Sincerely,

Linda Geary  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

New York could not exist without  
the Hudson River. PCB's must be  
cleaned up now, completely.

Sincerely,

Name:

Sheila Geist

Address:

E-mail:





scenichudson.org/pcbs



riverkeeper.org/pcbs

# #HealthyHudson

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SEP 01 2017



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



Dear Director Klawinski,

New York State's Economy and Quality  
of life is deeply affected by the healthy  
state of the Hudson River and the  
river has not been cleaned up  
You must push GE to completely  
clean up the toxins it has dumped here!

Sincerely,

Name:

Sheva Geist

Address:

E-mail:



**SCENIC HUDSON**

[scenichudson.org/pcbs](http://scenichudson.org/pcbs)



**RIVERKEEPER**  
NY's clean water advocate

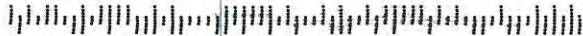
[riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)



**#HealthyHudson**

RECEIVED  
SEP 06 2017

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# EPA Second Draft Year Review

Linda Gerena [REDACTED]

Tue 8/22/2017 11:30 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

I URGE the EPA to officially say the cleanup is not protective and more work is needed to ensure a healthy Hudson River. Some important points to this issue are as follows:

\*Below the Troy Dam — and all the way to Manhattan — the EPA's own studies show PCB concentrations in fish haven't declined as expected as a result of the upriver dredging. With more PCBs left in the river than anticipated, additional dredging of the upper 40 miles of the Hudson River is necessary.

\*GE should be required to further investigate the lower 150 miles of the Hudson River to ensure cleanup goals are met.

\*EPA must give more weight to studies by federal and state agencies that challenge EPA's findings.

\*The cleanup cannot be declared complete by the EPA until the PCB contamination in the entire Hudson River reaches a level that does not threaten human health and the environment.

Thank you for taking these important points into consideration. Please help SAVE The Hudson River and The Hudson Valley for generations to come!

Sincerely,

Dr. Linda Gerena  
[REDACTED]  
[REDACTED]  
[REDACTED]

August 9, 2017

Ira Gershenhorn



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AUG 18 2017

Gary Klawinski, Director  
EPA Region 2, Hudson River Office  
187 Wolf Road, Suite 303  
Albany, NY 12205

Dear Gary Klawinski,

I attended the presentation tonight at John Jay College of Criminal Justice of the Second 5 year EPA Review of the Hudson River PCB Superfund Site.

Thank you for presenting the review.

The dredging done so far may have accomplished much but there is quite a ways to go. The Hudson River is filthy where PCBs are concerned and the prognosis of it reaching the goal of being able to eat one fish per week after 50 years is really bad news. Monitoring for 10 years before considering removing more sediment is not a tenable solution.

New York State loses at least 1 billion dollars per year due to the loss of a fishing and recreation industry because of the damage done to the Hudson River. Additional dollars are lost because marinas cannot dredge due to PCBs. One company has cost the state 100s of billions of dollars. Where are the EPA's priorities?

The presence of PCBs puts burdens on the departments of Health up and down the river. The presence of PCBs affects people who eat river fish.

The presence of PCBs killed a fishing industry which means lost taxes, lost income, lost jobs and all the ancillary income and jobs that result.

The presence of PCBs taints a recreational industry. Again this means lost taxes, lost income, lost jobs and all the ancillary income and jobs that result.

The presence of PCBs has destroyed an ecosystem. The costs in terms of lost resiliency will never be known.

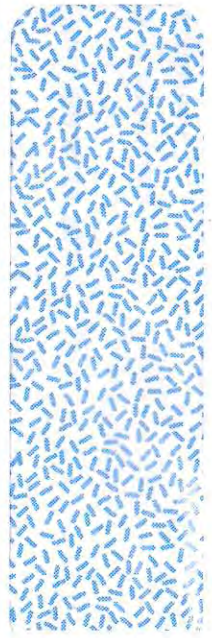
Just fix it. Everything else is a lame excuse.

Sincerely,  
Ira Gershenhorn

A handwritten signature in black ink, appearing to read "Ira Gershenhorn", written over a faint typed name.

986-VE-0906

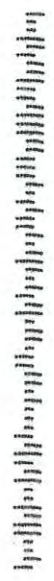
MR GERSTENBERG



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July 25, 2017


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JUL 28 2017

EPA Region 2 Director Gary Klawinski  
U.S. EPA - Region 2  
187 Wolf Road, Suite 303  
Albany, NY 12005

New York State is my home, I Live & Play  
by NY's waters. My Livelihood is Dependent on  
having clean water to Nourish Myself & Family.  
EPA, You Must Acknowledge the Condition ~~that~~  
of the Hudson River. <sup>Hudson River</sup> ~~It~~ is not safe.  
NYS Needs your help to ENSURE that  
the EPA Final Report must Plainly State the  
cleanup is "not protective". Your Final Report  
Should Eliminate the Unsubstantiated Claim that the  
cleanup "will be protective!" Contamination from  
PCB's <sup>coming</sup> ~~coming~~ from GE is ~~un~~ unacceptable  
& Fish, Sediment, & Water are not safe.  
The Lower Hudson River has seen little benefit.  
I don't want Cancer & It is My worst  
Nightmare to Contaminate My future children  
with the Volatile Substances of a Corrupt Cleanup.

Sincerely,

Jacquelyn Gier



Jacquelyn Gier



ALBANY

NY 1220

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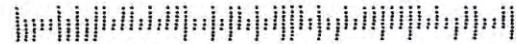
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EPA Region 2 Director Gary Klawinski  
U.S. EPA – Region 2  
187 Wolf Road, Suite 303  
Albany 12005

1220581138 0018





# Hudson River PCBs

Steve Gilman [REDACTED]

Fri 6/2/2017 1:17 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Cc: Steve Gilman [REDACTED];

Stephen Gilman  
[REDACTED]

Director Gary Klawinski, EPA Region 2  
[187 Wolf Road, Suite 303, Albany, NY 12205](mailto:epahrfo@outlook.com)

June 2, 2017

Public Comment on EPA's PCB Cleanup Plan

Dear Director Klawinski,

The five-year review on PCBs in the Hudson River by the U.S. Environmental Protection Agency, released June 1st, concludes cleanup efforts were implemented successfully due to what EPA is calling "encouraging" data collected since dredging ended in 2015.

I am an upstate NY farmer living in the Upper Hudson River Valley in the Town of Stillwater and a longtime avid fisherman. Our section of the Hudson River has been acutely contaminated by the manufacture of PCBs since the 1940s — and now, after a brief "cleanup" we are to understand that even using the rosiest of scenarios — under the proposed EPA plan local Hudson fish will be safe to consume, once a week — in 53 years.

You've got to be kidding me! This so-called "progress" is plainly inadequate and further remediation and dredging is completely necessary. An EPA "wait and see" scenario only perpetuates the problems — which include the dissipation of PCBs into the wider Hudson Valley environment — with proven negative health effects on wildlife and humans (not just those who eat the fish). Further, the New York States Department of Environmental Conservation, the state Attorney General's Office, the National Oceanic Atmospheric Administration and the U.S. Fish and Wildlife Service have warned of long-term impacts caused by leftover sediment.

Since it's clear that numerous Hudson River "hot spots" are still bleeding PCBs into our environs and ecology — a further cleanup phase is both warranted and necessary. To quote a statement by the NYS DEC, "We strongly dispute their conclusions and maintain that the significant amount of contamination left in the river threatens both public health and the environment. DEC will continue to fight for the Hudson River and New Yorkers and hold the polluter accountable for its actions."

Please provide a link to these gathered public comments.

Thank you.

Sincerely,  
Stephen Gilman

# EPA Second Draft Year Review

M. A. Goddard [REDACTED]

Wed 8/23/2017 9:50 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am a resident of Nyack (on the Hudson) and have lived a block away from the Hudson River since 1968. This great river, the Hudson, has become cleaner and healthier in these past nearly 5 decades.

But the job of making it clean and healthy is NOT YET accomplished!

Additional dredging of PCBs in the upper Hudson is required. An investigation of contamination in the lower Hudson must be made to insure the health of residents there too.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Thank you for your consideration of these concerns and requests.

Sincerely,

Mary Goddard  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Nadine Godwin [REDACTED]

Wed 8/30/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am Nadine Godwin and I live in Manhattan, which abuts the broad and iconic Hudson River to its west. I, from time to time, enjoy the opportunities for sightseeing cruises and sailing trips on the river. And, of course, Riverside Park, popular with residents as a place for relaxation and outdoor activities, is so named for its location overlooking this grand work of nature.

Unfortunately, as is now known, current levels of contamination in the fish, sediment and river water are much higher than expected and the lower Hudson River saw little benefit or impact from the ongoing dredging project meant to effect a dramatic cleanup. The only appropriate conclusion for these conditions is that they are "not protective." No current report can accurately include language calling the remedy protective.

The original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered — after the remedy was determined — that there was three to five times more contamination in the upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup, as it should have done earlier in this process.

As a result, now, after six years of dredging, the Hudson River Superfund cleanup has not done the job it was supposed to do, meaning secure the health of the river. The contamination left in the river is significantly higher than expected and a danger to human health. More dredging is necessary for a true cleanup to be concluded.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging began. At the very least, you must call for and undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data are needed to determine if fish will recover in the reasonable time frames as agreed upon in the Record of Decision. I urge the EPA to also follow its own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Thank you for giving my comments serious consideration.

Sincerely,

Nadine Godwin  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

this is a simple formula - GE polluted  
the river and should be held responsible  
for the cleanup! the public should not  
suffer the consequences of GE's irresponsible  
and unhealthy practice of dumping dangerous  
chemical like PCBs

Sincerely,

Name: STEVE GOLD

Address:

E-mail:



scenichudson.org/pcbs riverkeeper.org/pcbs



# #HealthyHudson

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SEP 01 2017



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# EPA Second Draft Year Review

Patricia Goldberg [REDACTED]

Tue 8/22/2017 9:50 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

My family has been in Saugerties since the 1940s. Currently, we are third generation living in the same homes as our grandparents.

We enjoy all water activities. Please do not shut down the clean up before the job is complete. My it's like going to the moon, not reaching it and returning to Earth. All the money wasted. Don't waste money, complete the job.

I'd like future generations of my family to enjoy the Hudson too.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Patricia Goldberg

[REDACTED]  
[REDACTED]  
[REDACTED]

# Dredge the PCBs out of the Hudson River!

Allan Goldhammer [REDACTED]

Mon 8/21/2017 3:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I've lived by, worked on, and loved the Hudson River for most of my long life. It is criminal to consider the dredging work done on the Hudson now. The proposed remedy is not protective, and this language must be removed from the report!

There are still a significant amount of PCBs in the river bed which will continue to bleed into the river for the next several generations. It's time, NOW, to remove them. General Electric has fought this tooth and nail for decades, and it looks like the EPA has given in to their demands. They made this mess, they must clean it up. They have enough profit to pay this out.

The report must state that the remedy is not protective!

Sincerely,

Allan Goldhammer

[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Freya Goldstein [REDACTED]

Mon 8/21/2017 11:28 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am a resident of the Upper West Side of Manhattan. I enjoy being so near the Hudson River.

I am distressed that the PCB levels in the Hudson are still very high, with little improvement after the dredging process. The EPA must i further action to ensure that the people who fish or swim in the River are fully protected. Please take action for the health of New York State residents.

Sincerely,

Freya Goldstein

[REDACTED]  
[REDACTED]  
[REDACTED]



# Dredging

Karen Goodman [REDACTED]

Tue 6/6/2017 2:08 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

I am writing to weigh in on the issue of continued dredging of the Hudson. Since the river is not yet rid of PCBs, continued dredging is essential. We are counting on the EPA to protect our water supply! Please don't let us down.

Thank you,  
Karen Goodman  
[REDACTED]

July 25, 2017

RECEIVED  
JUL 28 2017

EPA Region 2 Director Gary Klawinski  
U.S. EPA - Region 2  
187 Wolf Road, Suite 303  
Albany, NY 12005

Dear Mr. Klawinski -

I am a very concerned citizen of this beautiful region asking for your further consideration in the matter of the draft of the Second Five Year Review of the Hudson River Superfund site.

The cleanup efforts of GE are insufficient based on current available information. Current levels of PCBs in fish, water and sediment are way too high, so I insist, along with many others, that your final ~~report~~ <sup>report must</sup> 1) state the cleanup is not protective and 2) eliminate the claim that the cleanup "will be protective."

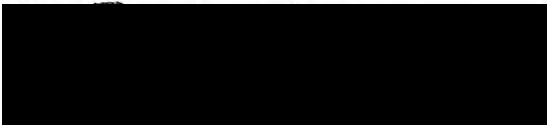
The Hudson River, as all waterways in our beautiful country, should be protected for our children. It is your responsibility, given your position to be an advocate for the future beings of our planet.

Sincerely,

Leslie W. Gordon

Leslie W. Gordon

Leslie W. Gordon



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MAILED FROM ZI

EPA Region 2 Director Gary Klawinski  
U.S. EPA – Region 2  
187 Wolf Road, Suite 303  
Albany 12005

12205-11367B



Dear Director Klawinski,

Please continue to clean up the Hudson  
River. The job is far from done.  
The fishermen need to make a living,  
fish should be safe to eat. Water needs  
to be safe.

Sincerely,

Name: Cindy Gould

Address: 

E-mail: 



scenichudson.org/pcbs riverkeeper.org/pcbs

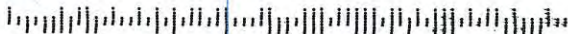


# #HealthyHudson

**RECEIVED**  
SEP 01 2017



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# EPA Second Draft Year Review

Nicole Graf-Javery [REDACTED]

Wed 8/23/2017 9:50 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am writing as a concerned resident of the Hudson Valley. I was raised in Hyde Park and Staatsburg and have lived in Cold Spring, Cortlandt Manor, and Pawling. I consider the Hudson River my home and I want to ensure that we clean up the mess that General Electric and other companies have polluted our waters with. It's a crime to diminish G.E.'s responsibility from original statement and agreements on clean up. The Hudson River is cleaner today than when I first arrived in the 1980s, but we're not done clearing the contaminates.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Thank you for your time. I trust you will take our concerns seriously and do what is right for the environment and future generations of Hudson Valley residents.

Sincerely,

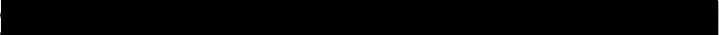
Nicole Graf-Javery  
[REDACTED]  
[REDACTED]  
[REDACTED]

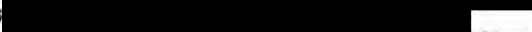
Dear Director Klawinski,

A deal is a deal - GE is still responsible for  
this cleanup. New York needs a healthy Hudson  
River for food, recreation, beauty, &  
conservation purposes. We cannot wait  
100 or even 50 years for this!

Sincerely,

Name: Meryl Greenblatt

Address: 

E-mail: 



SCENIC  
HUDSON

[scenichudson.org/pcbs](http://scenichudson.org/pcbs) [riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)



RIVERKEEPER  
NY's clean water advocate

NEW YORK  
NY 100  
AUG '17

# #HealthyHudson

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AUG 22 2017



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205





# EPA Second Draft Year Review

Hannah Greene [REDACTED]

Mon 8/28/2017 4:32 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am a resident of Chappaqua, New York. My family and I regularly go hiking at the Rockefeller Preserve and enjoy the serenity of gazing out at the Hudson. We have also attended the Clearwater Festival in the interest of cleaning up the Hudson. This river adds much beauty and joy to our lives, and is a critical natural resource here in New York State. It is imperative that we protect it from contamination and pollution. As such, the EPA's report must state affirmatively regarding the current plan that it lays forth that the remedy provided therein is not effective, and must delete the phrase that "the remedy will be protective." Critically, it must require additional dredging of PCBs in the upper Hudson and investigation of contamination in the lower Hudson. Such threats to our water supply poses a public health risk and endangers our ecosystem, while simultaneously reducing property value and outdoor activities for families.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Hannah Greene  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Rosalie Griffith [REDACTED]

Tue 8/22/2017 11:30 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

R. Griffith  
[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Joan Grishman [REDACTED]

Mon 8/21/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

We want to fish and swim healthfully in the Hudson. The contamination doesn't stay in the river. The shorelines won't support crops or animals.

Sincerely,

Joan Grishman

[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

Please do what is in your  
utmost power to protect the  
people, land, and water of the  
Hudson Valley. Thank you for  
your service.

Sincerely,

Name:

Daley Groen

Address:

[Redacted Address]



scenichudson.org/pcbs



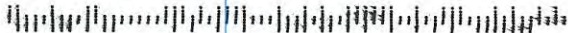
riverkeeper.org/pcbs

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SEP 01 2017



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# Hudson River dredging

carol grunkemeyer [REDACTED]

Thu 7/6/2017 10:20 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Mr. Klawinski,

Please continue to require GE to clean up their PCB mess by dredging the Hudson River.

Thank you,  
Carol Grunkemeyer

[REDACTED]  
[REDACTED]

# Hudson River PCB cleanup

Rob Grunkemeyer [REDACTED]

Thu 7/6/2017 9:46 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

I would like to see the EPA increase pressure on General Electric to continue to dredge the Hudson River and remove more pcb laden sediment.

Robert Grunkemeyer  
[REDACTED]

# More dredging is needed for the Hudson

Christine Guarino [REDACTED]

Mon 8/21/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I live in new paltz and often kayak and paddle board on the Hudson. I'm concerned about GE's toxic wastes in the river and the EPA determination that they have cleaned the river sufficiently. This is not acceptable. The report must state the remedy is not protective. And EPA must remove from the report the phrase 'the remedy will be protective'. Clean up the Hudson by finishing the dredging. Protect the health and natural resources of New Yorkers.

Sincerely,

Christine Guarino  
[REDACTED]  
[REDACTED]  
[REDACTED]



Dear Director Klawinski,

THE SOLUTION TO POLLUTION IS NOT  
DILUTION! WE CAN NOT  $\frac{1}{2}$  SHOULD NOT LET GE  
WAIT FOR THEIR RIVER TO "FIX ITSELF" BY  
JOSO (PURPORTEDLY). MORE ~~ACT~~ ACTION  $\frac{1}{2}$  REMEDIATION  
IS NEEDED NOW! A SAFE  $\frac{1}{2}$  CLEAN WATERWAY  
SHOULD NOT BE A DREAM; WITH DIRECT ACTION  
Sincerely,  $\frac{1}{2}$  GE'S SUPPORT, IT CAN BE A REALITY

Name: MICHAEL GUNDERSEN

Address:

E-mail:



[scenichudson.org/pcbs](http://scenichudson.org/pcbs) [riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)



NEW YORK NY 100

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# #HealthyHudson

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

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SEP 06 2017



# More dredging is needed for the Hudson

Mary E. Gunther [REDACTED]

Mon 8/21/2017 12:08 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

For decades, GE's plants dumped toxic waste into the Hudson River. Now the EPA is saying GE doesn't have to finish cleaning up its mess. The EPA's preliminary findings state that in 50 years people will be able to eat ONE FISH A WEEK from the Hudson and not get sick. And that's good enough for GE and the EPA. It's NOT good for the Hudson River and for those of us who live on it's magnificent but POLLUTED SHORES!!!

The EPA needs to declare the cleanup "not protective" of human health and the environment, and that additional dredging is necessary.

Sincerely,

Mary E. Gunther

[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Anne Hager [REDACTED]

Mon 8/28/2017 4:10 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am a resident in the far west village of Manhattan. My family lives just two blocks from the Hudson River. In warm weather, we spend a huge amount of time enjoying the river. I take my two young children to go biking, picnicking, playing on pier playgrounds, and taking ferry trips to Governor's Island. We adore the Hudson and taking care of it is incredibly important to us. I grew up in New York City and I know how far we have come in improving the health of the Hudson, but there is still a lot of work left to be done.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Anne Hager  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Nancy Hager [REDACTED]

Tue 8/29/2017 5:10 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

As a resident of the Far West Village in Manhattan for over 50 years, I have recently been thrilled to witness the gradual transformation of the Hudson River and its waterfront from an inhospitable environment of foul smelling water and decaying piers to one that is increasingly welcoming to life. I now bike down to the Battery and up to Riverside Park, go kayaking at the Downtown Boathouse, take my grandchildren to two nearby Greenway playgrounds, join friends and family for picnics on the piers and lawns. I am also a birder and have a collection of photographs of cormorants, brants, mallards, Canada geese, a black-crowned night heron, plus numerous songbirds that evidence the return of life to river and its shoreline. And within the last few months, whales have been sighted, one documented in a photo taken by my son off the Christopher Street pier.

The work of the EPA, Riverkeeper, Clearwater (to which I am a long-time contributor), and other organizations is paying off. But there is more to be done. The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Nancy Hager  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

I learned of the pollution dilemma in the Hudson River in 1977, when my husband, then employed by [REDACTED], did a sediment study near Albany. I'm saddened to learn from our daughter, who works in land conservation and park development along the Hudson, that it's still not safe for swimming, boating or fishing. I applaud your dedication in the face of adversity and support returning the river to a safe condition.

Sincerely,

Name: Christine Haque

Address: [REDACTED]

E-mail: [REDACTED]

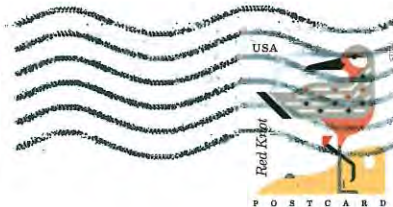


scenicudson.org/pcbs riverkeeper.org/pcbs



MANCHESTER NH 030

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# #HealthyHudson

*a river with great  
economic and  
recreational  
potential.*

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

RECEIVED  
AUG 21 2017



Dear Director Klawinski,

My father worked for an environmental consulting firm in the early '70s [redacted] mapping the extent of known PCB-contaminated sediments. I'm now the 2<sup>nd</sup> generation working toward a cleaner Hudson River, as a [redacted] employee. This is precedent-setting; please find the status non-protective and conduct sampling in the lower Hudson, and require dredging Troy → NYC.

Sincerely,

Name: Emily Hague

Address: [redacted]

E-mail: [redacted]





scenic Hudson.org/pcbs riverkeeper.org/pcbs



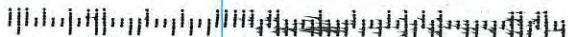
# #HealthyHudson

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SEP 01 2017



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

1205-113678



Dear Director Klawinski,

I WRITE TO ENCOULAGE YOU TO CONTINUE YOUR EFFORTS TO  
CLEAN THE HUDSON RIVER. I WAS PROJECT DIRECTOR FOR  
[REDACTED], WHO CONDUCTED THE FIRST SURVEY OF  
PCB DISTRIBUTION IN THE RIVER IN 1977. WE WERE HIRED  
BY NYSDEC TO DO THE SURVEY AND WORKED WITH JIM  
TOFFELMIRE. I REMEMBER BEING SHOCKED BY THE CALLOUS  
ATTITUDE OF GE AT THE TIME. KEEP UP THE GOOD WORK!

Sincerely,

Name: PAUL R. HAGUE

Address: \_\_\_\_\_

E-mail: [REDACTED]



**SCENIC  
HUDSON**

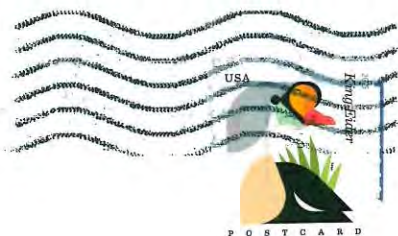
[scenicudson.org/pcbs](http://scenicudson.org/pcbs) [riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)



**RIVERKEEPER**  
NY's clean water advocate

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AUG 21 2017

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# EPA Second Draft Year Review

Brandon Hakulin [REDACTED]

Mon 8/21/2017 3:30 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am a concerned citizen and voter. I am also a Marine Corps veteran, science teacher and fisherman. Some day I would love to eat fish out of the amazing Hudson River. Please continue to support efforts to clean it up. It is pretty messed up we can't safely eat fish out of a river close to home. I have hope that some day I may. Please don't smash my hopes and please support the people and the waters they enjoy. You have the power to do good, please do so.

Thank you,

Sincerely,

Brandon F Hakulin

Sincerely,

Brandon Hakulin  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Karen Hall <[REDACTED]>

Mon 8/21/2017 5:12 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Fish, sediment and water still polluted. There was little benefit or impact from the dredging project, therefore, "not protective."

Dredging not completed, must be resumed.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Karen Hall

[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Rhonni Hallman [REDACTED]

Mon 8/21/2017 11:46 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I live in Poughkeepsie. I love being on the Hudson. We need you to finish cleaning it up!

Sincerely,

Rhonni Hallman

[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

My heart breaks over the damage  
done to the Hudson River by GE.

Please, please ensure the cleanup  
continues. The work done to date is  
not protective of health or life + environment

Give our children what we can't have:  
A healthy Hudson River!!

Sincerely,

Name:

MARY HAMMETT STEVENSON

Address:

E-mail



**SCENIC HUDSON**

[scenichudson.org/pcbs](http://scenichudson.org/pcbs)



**RIVERKEEPER**

NY's clean water advocate

[riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)

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**#HealthyHudson**

Please Save  
our  
River!!

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

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AUG 22 2017





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SEP 06 2017

*Martin Hangarter*

August 26, 2017

Gary Klawinski  
Hudson River Field Office  
187 Wolf Road, Suite 303  
Albany, NY 12205

RE: RESPONSE TO FIVE YEAR REVIEW OF THE UPPER HUDSON DREDGING OPERATIONS

Dear Mr. Klawinski:

I live on the Hudson River. My property extends literally into the Hudson River. I have born witness to the dredging and cleanup operations. I remain very concerned about my property and its potential for the next generation. The following things bother me, and in my opinion, need to be addressed by your review:

1. Is the remedy functioning as intended by the decision documents? NO
  - a. It is clear from the initial information on habitat and fish samples that it is taking longer for recovery than anticipated. PCB's were far deeper and more dispersed than the ROD anticipated.
  - b. Habitat reconstruction has not resulted in repopulation of species within the parameters that the ROD anticipated.
  - c. Resuspension and down river redistribution of sediments into the flood plains has not been addressed.
2. Are the exposure assumptions, toxicity, data, cleanup levels, and remedial actions objections used at the time of the remedy selection still valid? NO
  - a. The variability of testing methods has tainted the results to date.
  - b. The ROD left behind significant deposits throughout the upper Hudson that are not part of the cleanup. Those deposits are in excess of standards used in other PCB cleanup projects and leave our river subject to additional cleanup costs every time we attempt a project – whether residential or public.
3. Has any other information come to light that could call into question the protectiveness of the remedy? MOST DEFINITELY YES
  - a. The original Champlain Canal was not included in the remedy and it is hydrologically part of the Hudson River. Significant PCB concentrations were found and partially removed from the canal north of Lock 5, yet the original canal was ignored. The original canal is now so silted in with blocked culverts and dead fall that it is often stagnant and overflows the banks during heavy storms.

- b. The ROD ignored the industrial and recreational use of the river when it required dredging only to the depth of the contamination – ignoring the fact that New York State has been unable to dredge to required depths for decades. Additionally, the EPA (with the ROD as an excuse) refilled areas that had silted in over the decades – impeding industrial and recreational use.
- c. The ROD focused on river sections closer to Fort Edward, ignoring contamination of the same toxicity in river sections below Lock 5. Those areas will continue to redeposit PCB's in the upper river, the flood plains and the lower river.

For these reasons – I urge the EPA to recognize that the remedy as designed is not protective. Additional dredging is required if those of us in the upper Hudson are to have a clean river. We cannot undertake projects and use of our river with the knowledge that the legacy of PCB's is still lurking in the sediments and floodplains.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Marty Hangarter", with a long horizontal flourish extending to the right.

Marty Hangarter



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Gary Klawnski  
Hudson River Field Office  
187 Wolf Road, Suite 303  
Albany NY 12205  
ALBANY NY 12205

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JUL 27 2017



**COMMENT SHEET — 2017 Five Year Review Report**  
**Hudson River PCBs Superfund Site**

Name (Please Print): Terence P. HANNIGAN

Agency/Organization: private citizen

Address: [REDACTED]

Written comments must be postmarked by September 1, 2017

7/21/17

COMMENTS:

Dear Mr. Klawinski,

I write to express my concern about the Hudson River clean up and for ongoing dredging. My hope is that the river could and should be returned to its natural beauty and be a safe source of water.

I also believe the NYers and all people should be able to swim and boat in the River without fear for their health and safety.

Please share this concern with those who make decisions about improving the the Hudson River's water quality.

Many thanks,  
*Terence P. Hannigan*

Written Comments can be sent by mail or email to:

Gary Klawinski, Director  
EPA Region 2, Hudson River Office  
187 Wolf Road, Suite 303  
Albany, NY 12205  
email: epahrfo@outlook.com

HANUIGAN

ALBANY NY 120

29 JUL 2017 9M21



Mr. Gary Klaminski, Director  
EPA Region 2, Hudson River  
OFFICE  
187 Wolf Road Suite 303  
Albany NY 12205

12205 138

# Protect people and wildlife, not GE

Beth Hanson [REDACTED]

Thu 8/31/2017 12:15 PM

To: Gary Klawinski, Project Director, EPA <epahrfo@outlook.com>;

Aug 31, 2017

Mr. Gary Klawinski, Project Director, EPA  
US EPA Hudson River Field Office, Region 2, 187 Wolf Road, Suite 303  
Albany, NY 12205

Dear Mr. Klawinski, Project Director, EPA,

It is unconscionable that GE polluted the Hudson decades ago, and that the company is now not being held responsible for cleaning it up to the full extent that's possible. I live next to the river, swim in it, and love it, and am saddened that people like me who live on the river are unable to eat fish from the river, and enjoy it in every way. Please require that GE finish cleaning up the mess it made of the Hudson.

Beth Hanson  
[REDACTED]

Sincerely,

Ms. Beth Hanson  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA's cleanup of Hudson River

Marc Happel [REDACTED] >

Fri 9/1/2017 2:06 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Members of the EPA-

As a tax paying property owning citizen and resident living adjacent to the Hudson River I ask that the EPA live up the "Protection" part of it's name and follow thru with insisting that the still unfinished clean up of PCBs poisoning our river be implemented without further delay. To do otherwise would break your pledged mission to protect our environment and the safety of our citizens. Besides being an ecological poisoning, the PCB' dumped in our river by General Electric represents an affront to the region's historically symbolic place as a cradle of American culture. Being the birthplace of numerous revolutionary cultural, technological, social, and political ideas has had an essential impact in forming our country. The Hudson River is our Nile and should be treated with the reverence it deserves.

Marc Happel

Sent from my iPhone

Dear Director Klawinski,

A NY resident since 1965 the health of the Hudson River is very important to me. GE must continue its clean up of PCB. The proposed closing of Indian Point is a step in the right direction and the river must no longer be a highway for oil and gas.

Sincerely yours,  
Anne Hansen





Ms. Anne Heaney



USA FOREVER

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AUG 22 2017

Gary Krawinski  
Director, Hudson River Field Office  
US EPA  
187 Wolf Road, Suite 303  
Albany, NY 12205

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recycled  
© 2015 USPS



Dear Director Klawinski,

My family and I live a short walk  
from the Hudson River and the  
health of the entire river is important  
to us. GE must continue its clean  
up. We oppose the use of the  
river for a highway for oil and gas

Sincerely,

Name:

Address:

E-mail:

Anne Heaney Johnson



**SCENIC  
HUDSON**



**RIVERKEEPER**  
NY's clean water advocate

[scenichudson.org/pcbs](http://scenichudson.org/pcbs) [riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)

# #HealthyHudson

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AUG 22 2017



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# More dredging is needed for the Hudson

Patricia Heller [REDACTED]

Mon 8/21/2017 11:30 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

What the heck are you thinking? I don't have to give you reasons -- just do the right thing. Clean up the water, clean up the Hudson, clean up the air, clean up the dirt, what's the matter with you? Do the right thing, period!

Sincerely,

Patricia Heller

[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Irene Herz [REDACTED]

Tue 8/22/2017 11:40 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am a web designer living in the Hudson Valley, in Ossining, NY.

I understand your draft Five Year Technical Review states that, even though current levels of contamination in fish, sediment and water are much higher than expected, you are planning to say that the remedy will be protective.

I urge you to state in your report that additional dredging of PCBs on the upper Hudson are required and that there should be an investigation of contamination in the lower Hudson.

Sincerely,

Yours sincerely,

[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

I'm a resident of Manhattan and have enjoyed  
utilizing the recreational resources of the beautiful  
Hudson. <sup>In over two decades,</sup> Kayaking, Paddleboarding and more add to the  
reasons people live and visit here. The Hudson has come a  
long way in being cleaned up but still needs the EPA  
to safeguard the water quality and rid it of PCBs so we  
can fully enjoy the river, so fish can thrive and people  
can feel safe swimming, eating and more from these  
beautiful waters!!!

Sincerely,

Name: JONATHAN HERTZOG

Address:

E-mail:



**SCENIC HUDSON**

[scenichudson.org/pcbs](http://scenichudson.org/pcbs)



**RIVERKEEPER**

NY's clean water advocate

[riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)

NOV 27 2017 10:00 AM

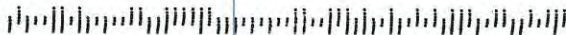
SEP 06 2017 9:40 AM



# #HealthyHudson

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SEP 06 2017

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# EPA Second Draft Year Review

Deborah Highley [REDACTED]

Mon 8/21/2017 3:30 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

My name is Deborah Highley and I live in the village of Rhinebeck. The Hudson River is vital to our community.

Concerning the second Year Draft Review for the Hudson River:

1. The report must state the remedy is not protective.
2. EPA must remove from the report the phrase "the remedy will be protective."
3. The report must call for additional dredging of PCBs in the upper Hudson.
4. The report must call for an investigation of contamination in the lower Hudson.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective".

I urge the EPA to follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Thank you for listening to those of us who live here.

Sincerely,

Deborah Highley  
[REDACTED]  
[REDACTED]  
[REDACTED]



Annie Hella

And

Annie Hella vs

July 25, 2017

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JUL 28 2017

EPA Region 2 Director Gary Klawinski  
U.S. EPA - Region 2  
187 Wolf Road, Suite 303  
Albany, NY 12005

Dear Mr. Klawinski,

I am living on the Hudson River for a period of time. I am concerned by Hudson river and I am commenting on the draft Second Five Year Review of the Hudson River Super Fund Site.

I feel the EPA must reconsider its conclusion of your Second Draft Five-Year Review of the Hudson River Superfund Project.

Your final report must plainly state the clean up is "not protective."

2) Your final report should eliminate the <sup>un-</sup>substantiated claim that the "cleanup" will be protective.

The Hudson River is one of the most historical beautiful rivers and deserves to be clean.

Sincerely,

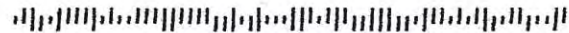
Annie Hella

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EPA Region 2 Director Gary Klawinski  
U.S. EPA – Region 2  
187 Wolf Road, Suite 303  
Albany 12005

12205-119878



# EPA Second Draft Year Review

Barbara Hobens [REDACTED]

Mon 8/21/2017 3:30 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Having watched the dredging of toxins by Intrepid Sea Air Space Museum in the 90's and by the Cold Spring dock in Putnam County, I am well aware of the necessity and benefits of cleaning up our river.

I have lived within a [REDACTED] of the Hudson most of my life and now, as the [REDACTED] I have another perspective. We have a DUTY to keep this river clean and to enforce those that have contaminated it to clean it up. As a Hyde Park resident, this is my drinking water!

The current "remedy" is not protective so "the remedy will be protective" must be removed. Additional dredging of PCBs must be made in the upper Hudson and monitoring and investigation must continue.

Since there are up to 5 times more contamination in the Upper Hudson than previously estimated, the EPA must expand the cleanup. Continued study of downriver contamination and plan for appropriate remedial action must be put into place.

I urge the EPA to conduct Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Thank you.

Sincerely,

Barbara Hobens  
[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Dana Hoey [REDACTED]

Mon 8/21/2017 3:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am a resident of Rhinebeck and I love the river. Please continue to restore it.

Sincerely,

Dana Hoey

[REDACTED]  
[REDACTED]  
[REDACTED]

# PCB cleanup by GE

Mimi [REDACTED]

Fri 8/4/2017 9:06 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Dear Mr. Klawinski,

I was disturbed to learn how serious the situation of PCB's are in the Upper Hudson - after all these years. There was a strong belief those many years ago that the PCB clean-up was not as rigorous as was necessary and now a follow-up study shows the need for significantly more dredging throughout the river. The quality of protection for human health and the environment is inadequate. More extensive clean-up is needed.

I live in South Nyack - a block from the river - I kyack in the river and walk along the shore. I have been told that is now exposing me to PCBs. It is time your agency do the honest work it committed to do so many years ago. You have an important responsibility. Take it on completely.

Miriam Hoffman  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Karin Holloway [REDACTED]

Mon 8/21/2017 3:30 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I'm a Michigander and I've driven through New York many times to visit family on the East Coast. I'm always surprised by its beauty! Knowing that the EPA thinks the Hudson, and the people along its course and eating it's bounty, isn't worthy of the complete protection an historically important watercourse deserves makes me ill - without eating any polluted fish. Dredging has got to be completed - please finish the job! You'll be able to point to the Hudson and show how effectively you're saving our country from internal ruin.

Sincerely,

Karin Holloway  
[REDACTED]  
[REDACTED]  
[REDACTED]



RECEIVED  
SEP 06 2017

August 29, 2017

Gary Klawinski  
Hudson River Field Office  
187 Wolf Road, Suite 303  
Albany, NY 12205

Re: Upper Hudson River Superfund site Five-Year Review

Dear Gary,

Thank you and your team for your continuing work in our region. The US EPA, NYS DEC and GE teams have been the best and brightest, and from the beginning of this project we have held optimism for a maximally effective river cleanup.

For 20 years I have been part of an economic redevelopment effort in Schuylerville and the Saratogas. From macro planning to the granular, from bootstrapping it to help from friends at all levels we have managed to bring a commercial resurgence to the river communities. I am an alternate representative for the Schuylerville Area Chamber of Commerce on the Community Advisory Group for the Dredging of the Hudson River.

We view the future with eager anticipation. A safe Hudson River environment is fundamental. We are concerned to make the remedies effective so that they will be protective of the immediate and long term health of our river and its inhabitants. A new generation has taken up interest through the environmental clubs and other academic groups. They will be observant for the next 40 years.

Much has been done and more remains to be done. In response to the Five-Year Review questions:

1. Is the remedy functioning as intended by the decision documents? NO
  - a. It is clear from the initial information on habitat and fish samples that it is taking longer for recovery than anticipated. PCB's were far deeper and more dispersed than the ROD anticipated.
  - b. Habitat reconstruction has not resulted in repopulation of species within the parameters that the ROD anticipated.
  - c. Resuspension and down river redistribution of sediments into the flood plains has not been addressed.
2. Are the exposure assumptions, toxicity, data, cleanup levels, and remedial actions objections used at the time of the remedy selection still valid? NO
  - a. The variability of testing methods has tainted the results to date.
  - b. The ROD left behind significant deposits throughout the upper Hudson that are not part of the cleanup. Those deposits are in excess of standards used in other PCB cleanup projects and leave our river subject to additional cleanup costs every time we attempt a project – whether residential or public.
3. Has any other information come to light that could call into question the protectiveness of the remedy? DEFINITELY YES
  - a. The original Champlain Canal was not included in the remedy and it is hydrologically part of the Hudson River. Significant PCB concentrations were found and partially

- removed from the canal north of Lock 5, yet the original canal was ignored. The original canal is now so silted in with blocked culverts and dead fall that it is often stagnant and overflows the banks during heavy storms.
- b. The ROD ignored the industrial and recreational use of the river when it required dredging only to the depth of the contamination – ignoring the fact that New York State has been unable to dredge to required depths for decades. Additionally, the EPA refilled areas that had silted in over the decades – impeding industrial and recreational use.
  - c. The ROD focused on river sections closer to Fort Edward, ignoring contamination of the same toxicity in river sections below Lock 5. Those areas will continue to redeposit PCB's in the upper river, the flood plains and the lower river.

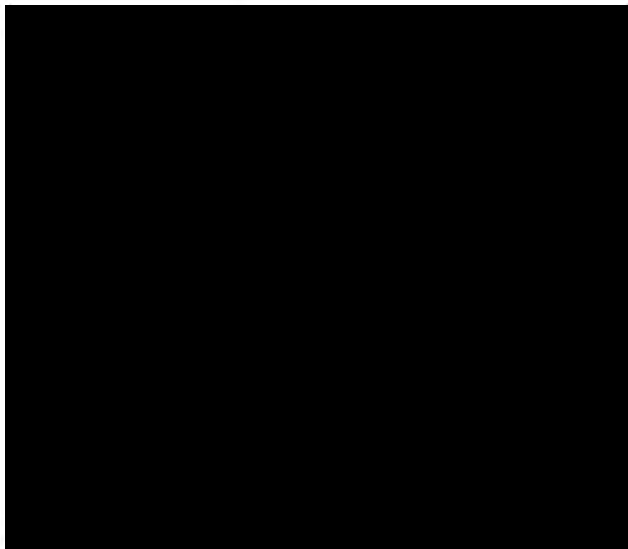
For these reasons I urge the EPA to recognize that the remedy as designed is not protective and application so far is not yet protective. Additional dredging is required if residents along the Hudson are to have a clean safe river. We are encouraging NYS Canal Corporation to develop navigational dredging to restore the commercial value of the river. We ask that you support this initiative in the ways in which you excel, while continuing research and planning for the next remedial phases.

Please share our thanks again with your team for your momentous work.

Sincerely yours,



Timothy Holmes



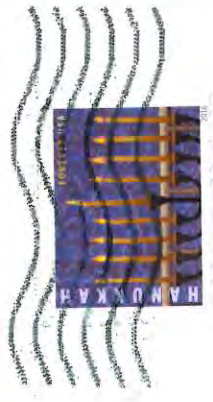


*AS*



ALBANY NY 12205

30 AUG 2017 PM 2:11



Gary Klawnski  
Hudson River Field Office  
187 Wolf Roads Suite 303  
Albany, NY 12205

12205-119678



# Hudson River cleanup

wendy holtzman [REDACTED]

Fri 8/18/2017 12:35 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

I respectfully urge you to continue the cleanup of the Hudson River.

After six years of dredging, a cleaner, safer Hudson is within reach. We can't stop now because abandoning the remaining toxic river sediments that federal, state and local agencies warn could set back economic and environmental recovery for decades.

More than 80 municipalities, 161 state legislators, editorials from The New York Times and numerous valley papers, as well as two federal agencies have called for more dredging.

Please consider the health of the environment & the economic wellbeing of the riverfront communities and continue cleaning up the Hudson River.

Sincerely,  
Wendy Holtzman

# GE's responsibility re: hudson River

[REDACTED]  
Wed 7/19/2017 1:22 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Sir:

It is the responsibility of the EPA to protect our rivers and the wildlife that is related to it.

GE was brought kicking and resisting its responsibility for cleaning up the pollution it caused. The river has NOT totally totally cleaned up.

It would be travesty to let GE be absolved before the job is done. The public depends on you not to give in to corporate pressure .

They must be required to do the right thing . We will be staying informed.

Arlene Holzman

[REDACTED]

# More dredging is needed for the Hudson

Patrick Hono [REDACTED]

Mon 8/21/2017 11:20 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

This is the sample message, you should customize this. I live in Highland NY, grew up on the Hudson River in Yonkers. Please do proper clean up of PCB contamination, continue dredging until job is complete. We want our kids and grandchildren to swim and be able to eat fish from the beautiful Hudson. Something our generation could not do. Do the right thing. Finish job of dredging PCB contaminated mud and silt.

Sincerely,

Patrick Hono

[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Joseph Hope, Jr. [REDACTED]

Mon 8/21/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am Joseph Hope and a life long Hudson Valley resident. Prematurely stopping dredging before the Job is finished is absurd .the report must state the remedy is not protective. And The EPA must remove from the report the phrase "the remedy will be protective".

My family and I use the river( both above AND below the Dam) for fishing regularly. In my lifetime I've NEVER been able to eat my catch due to PCB's.and hopefully maybe SOME DAY my [REDACTED] might be able to.

Sincerely,

Joseph G. Hope Jr.

[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

to hell - with capitalism & protecting  
corporations. they ARE NOT people  
& they can AFFORD to operate in  
a environmental way. ENOUGH  
Clean our HUDSON RIVER -  
THIS IS WHERE WE STARTED!

Sincerely,

Name: Robin Horowitz

Address:

E-mail:



**SCENIC HUDSON**

scenichudson.org/pcbs riverkeeper.org/pcbs



**RIVERKEEPER**  
NY's clean water advocate

ALBANY  
NY 120  
29 AUG '17

# #HealthyHudson

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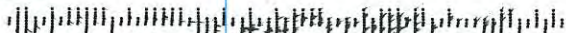


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MAILED FROM ZIP CODE 12601



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

205-113878



# More dredging is needed for the Hudson

Pat Hughes [REDACTED] >

Mon 8/21/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I live on the Hudson at Rensselaer, NY. It is easy to see That the river is not healthy yet, more dredging is needed. You can't take and eat any of the fish from the river with out the risk of illness.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective".

Following its own review of the cleanup's effectiveness, the New York State Department of Environmental Conservation found, "The Remedy is not protective of human health and the environment based on uncontrolled risks, and EPA should undertake all necessary actions to ensure that the remedy becomes fully protective to the benefit of the people of New York State."

More review and action is needed now.

Sincerely,

Sincerely, Patricia Hughes

[REDACTED]  
[REDACTED]  
[REDACTED]



# EPA Second Draft Year Review

Carole Hunt [REDACTED]

Tue 8/22/2017 11:00 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

My family boated on the Hudson River 50 years ago, putting the boat in at Englewood Cliffs. We have seen the river get horribly polluted and in recent years, we have seen the great results of legislation to clean up the river.

This clean-up will be the legacy of this generation on the Hudson River. Finishing the job is essential to the residents, wildlife, recreation and resulting economic benefits, and the future health of the river.

Please finish the job!

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Carole Hunt  
[REDACTED]  
[REDACTED]  
[REDACTED]

# Protect people and wildlife, not GE

David Hupert [REDACTED]

Wed 8/30/2017 12:10 AM

To: Gary Klawinski, Project Director, EPA <epahrfo@outlook.com>;

Aug 29, 2017

Mr. Gary Klawinski, Project Director, EPA  
US EPA Hudson River Field Office, Region 2, 187 Wolf Road, Suite 303  
Albany, NY 12205

Dear Mr. Klawinski, Project Director, EPA,

I have been kayaking on the Hudson since 1961 when it was so polluted it was said that you could not drown if you fell in to the river because you would die of ptomaine poisoning first. The cleanup since the passage of the Clean Waters Act has been an enormous benefit to millions of people, residents of New York City and the Hudson Valley and visitors from all over the country and the world who have learned that the river is an asset to their lives, not something to be avoided. For one segment of the population the cleanup is not close to complete, the commercial, recreational and sustenance fishing community.

The presence of unseen carcinogens has destroyed the commercial fisheries and made the consumption of fish caught in the Hudson a dangerous activity. The PCBs were a byproduct of the mighty manufacturing prowess of GE which supplied much needed products to the nation and significant profit to the company and its shareholders. Unfortunately GE used the Hudson as a dumping ground for its industrial waste, even after it was known that PCBs were highly toxic. The corporation grew rich while it impoverished its neighbors.

GE should be held to a higher standard than following its plan for cleaning the river despite the shortcomings of that plan. The standard should be the restoration of the river to a condition that will not leave us to fear the aquatic bounty the Hudson once did and could again provide.

Thank you for the opportunity to submit my comments.

Sincerely,

Mr. David Hupert  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Ryan Jafri [REDACTED]

Mon 8/21/2017 4:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

The Hudson River is not only vital to the wellbeing of many citizens of New York but also a staple in the New York City landscape. Additional efforts towards clean up up are necessary such as additional dredging of the PCBs in the upper Hudson River, a look into the contamination of the lower Hudson, and the removal of the phrase "the remedy will be protective." Said phrase should be replaced with "the remedy is NOT protective."

It's the EPA's duty to do such things. A petition should not be necessary.

Sincerely,

Ryan J.  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

As a concerned resident and avid  
recreational user of the Hudson River  
I would like to see continued pressure  
on G.E. to continue its requirement to  
dredge for removal of PCBs.

Sincerely,

Name: \_\_\_\_\_

Ed Jahn

Address: \_\_\_\_\_

E-mail: \_\_\_\_\_



scenichudson.org/pcbs



RIVERKEEPER  
NY's clean water advocate

riverkeeper.org/pcbs

ALBANY NY 12205

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# #HealthyHudson

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AUG 29 2017

Gary Klawinski

Director, Hudson River Field Office

U.S. Environmental Protection Agency

187 Wolf Road, Suite 303

Albany, NY 12205



8-1-17

Dear Director Klawinski,

The progress that GE has made so far does not meet protective standards for those of us who live in Stuyvesant in Columbia County. Please uphold clean water, safe fish and wildlife protective standards. GE's job is not finished

Sincerely,

Name: \_\_\_\_\_

Lee F Jamison

Address: \_\_\_\_\_

E-mail: \_\_\_\_\_

405



**SCENIC HUDSON**

scenichudson.org/pcbs



**RIVERKEEPER**

NY's clean water advocate

riverkeeper.org/pcbs

# #HealthyHudson

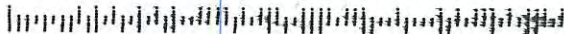
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Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# decision on dredging

Lois Janove [REDACTED]

Tue 6/6/2017 3:05 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

June 6, 2017

Dear Mr. Klawinski,

As a Poughkeepsie resident, and someone who grew up in the Hudson Valley, I am very upset by the EPA's decision to recommend discontinuing dredging in the Hudson River. Having begun the project to clean up the PCBs, it is only right to finish removing the pollution at the bottom of the river without relying on nature to do the job. The National Oceanic and Atmospheric Administration and the U.S. Fish and Wildlife Service conclude that PCB levels in fish will to be continue to be unsafe considerably longer than suggested by your agency.

I strongly urge the EPA to reconsider, and instead encourage further dredging until the Hudson River is once again safe and clean for the people of our beautiful valley.

Sincerely,  
Lois Janove



# EPA Second Draft Year Review

Susan Johnson [REDACTED]

Tue 8/22/2017 11:30 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am a resident of Croton on Hudson in the lower Hudson River Valley. I see fishermen along the shore on a regular basis. The PCB's have not been cleaned up sufficiently. The Review must state that the remedy is not protective. Please remove the phrase "the remedy will be protective." You must call for the need of additional dredging of PCBs in the upper Hudson and the report must call for an investigation into contamination of the lower Hudson River. People's health is at risk.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Susan Johnson  
[REDACTED]  
[REDACTED]  
[REDACTED]

# Public Comments on Second Five-Year Review Report, Hudson River

Abigail Jones [REDACTED]

Wed 8/30/2017 8:47 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>; klawinski.gary@epa.gov <klawinski.gary@epa.gov>;

 1 attachments (70 KB)

2017 08 30 EPA FYR Public Comments of Abigail Jones.pdf;

Dear Gary,

Attached, please find my comments regarding the Second Five-Year Review Report for the Hudson River PCBs Superfund Site.

Thank you for your consideration of these comments.

Sincerely,  
Abby

August 30, 2017

Sent Via Email Only

Gary Klawinski, Director  
EPA Region 2, Hudson River Office  
187 Wolf Road, Suite 303  
Albany, NY 12205  
[epahrfo@outlook.com](mailto:epahrfo@outlook.com)  
[klawinski.gary@epa.gov](mailto:klawinski.gary@epa.gov)

**Re: Public Comments on the Proposed Second Five-Year Review Report for the Hudson River PCBs Superfund Site**

Dear Mr. Klawinski,

Please accept these public comments regarding the United States Environmental Protection Agency, Region 2's ("EPA") *Proposed Second Five-Year Review Report for the Hudson River PCBs Superfund Site*, dated May 31, 2017 ("Second FYR Report").<sup>1</sup> EPA's conclusion of anything other than "Not Protective" is inappropriate, is unsupported by the facts and the science, and is a failure of EPA to protect the Hudson River and the communities that rely on it – whether for economic reasons, recreational reasons, or to supplement the food their families eat. EPA must not finalize the Second FYR Report as written, and must conclude that the remedy for OU2<sup>2</sup> is "not protective."

As you know, I am a former staff attorney with Riverkeeper, Inc., where one of my most important cases was the Hudson River PCBs Superfund Site. In that capacity, I was an active member of the Community Advisory Group ("CAG") as well as the technical review team for EPA's second Five Year Review. I have visited the remediation activities undertaken by General Electric ("GE") numerous times and advocated for EPA to require GE to do more to protect the health of the Hudson River and our communities. Although I am no longer an attorney with Riverkeeper, my passion for the Hudson River and my desire to ensure that EPA requires GE to appropriately clean up the outstanding mess it's made has not waned. And while my comments may not be as technical or as in-depth as they once might have been, they are

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<sup>1</sup> These comments are timely submitted due to the extension of the public comment period deadline to September 1, 2017. See [https://www.epa.gov/sites/production/files/2017-06/documents/hudson\\_2ndfyr\\_advisory\\_commentperiodextension\\_060817\\_final.pdf](https://www.epa.gov/sites/production/files/2017-06/documents/hudson_2ndfyr_advisory_commentperiodextension_060817_final.pdf).

<sup>2</sup> Operational Unit 2, or OU2, includes the remediation of PCBs from the upper 40 miles of the Hudson River as well as the institutional controls aimed at preventing people from eating highly contaminated fish (i.e., the NYS Dept. of Health's Fish Consumption Advisory), as was required in the 2002 Record of Decision ("2002 ROD") and subsequent Consent Decrees. I am not commenting on the validity of EPA's protectiveness determination for OU1 (remnant deposits), even though it is included in the Second FYR Report. The remedy for OU3 (the floodplains) is at the very beginning stages of development, and it will be several years before that remedy is even implemented.

clearly supported by the facts and the laws, regulations, and EPA guidance documents – unlike your own conclusions in the Second FYR Report.

It is telling that the New York State Department of Environmental Conservation (“NYSDEC”) has already undertaken its own independent “five-year review” (“NYSDEC FYR Recommendations”) and has concluded that the OU2 remedy is “not protective” of human health and the environment under CERCLA’s standards.<sup>3</sup> Additionally, NYSDEC concluded that EPA must perform a Remedial Investigation and Feasibility Study (“RI/FS”) for portion of the Hudson River Superfund Site below the Federal Dam at Troy.<sup>4</sup> I agree with NYSDEC’s analysis and conclusions and hereby incorporate NYSDEC’s conclusions and recommendations in the NYSDEC FYR Recommendations in these public comments.

I know that Riverkeeper, along with other key groups such as Scenic Hudson, Clearwater, and NRDC, will be submitting comments regarding the inadequacies of the Second FYR Report, and I fully support the arguments those organizations have or will make in opposition to EPA’s egregious conclusions regarding the protectiveness of the OU2 remedy for the Hudson River PCBs Superfund Site. I believe that Riverkeeper’s President, Paul Gallay, said it best:<sup>5</sup>

The evidence clearly shows the Hudson River remedy is not protective of human health and the environment and will not meet EPA’s goals. EPA’s decision flies in the face of that evidence. Instead of moving the goal posts, EPA should try to meet its own goals by mandating additional remediation. We cannot accept an outcome that will leave Hudson River fish toxic for generations.

For those reasons, the reasons set forth in the comments of the environmental organizations and federal and New York State agencies, and the reasons set forth herein, **EPA must conclude that the OU2 remedy is “not protective” of human health and the environment and must also undertake appropriate and time-sensitive analysis as to the additional remediation that is necessary to actually protect human health and the environment as required by CERCLA.**

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<sup>3</sup> See NYSDEC, Recommendations to EPA for the “Five Year Review Report” for Hudson River PCBs Site (December 2016) (“NYSDEC FYR Recommendations”), available at [http://www.dec.ny.gov/docs/fish\\_marine\\_pdf/hudsonredging5yr.pdf](http://www.dec.ny.gov/docs/fish_marine_pdf/hudsonredging5yr.pdf).

<sup>4</sup> See *id.*

<sup>5</sup> <https://www.riverkeeper.org/news-events/news/stop-polluters/contaminated-sites/riverkeeper-responds-epas-five-year-review-hudson-river-pcb/>.

**I. Based on EPA's Own Guidance, "Will Be Protective" Is Not an Available Conclusion for the OU2 Remedy**

The Second FYR Report kicks the can down the road, yet again,<sup>6</sup> and concludes that the OU2 remedy “will be protective”.<sup>7</sup> Yet as EPA’s own guidance document makes clear: the will be protective determination is appropriate when EPA has “sufficient data and documentation to conclude” that human and ecological exposures are “currently under control and no unacceptable risks are occurring.”<sup>8</sup> Here, the human exposures are most certainly *not* currently under control. Indeed, by EPA’s own admission, *unacceptable risks to humans continue to occur* so long as the NYS Department of Health’s fish consumption advisories fail to prevent people from eating – and feeding their families – PCB-contaminated fish from the Hudson River.<sup>9</sup>

Moreover, the 2012 FYR Guidance clearly states that the “will be protective” determination is only available where the remedy is “under construction” and “no remedy implementation or performance issues have been identified.”<sup>10</sup> First, the OU2 remedy is not under construction, since the *physical* construction of the OU2 remedy (i.e., the dredging activities undertaken by GE) is completed and has been for over a year now.<sup>11</sup> If anything, the OU2 remedy might be classified as an “operating remedial action” since the cleanup levels have not yet been achieved.<sup>12</sup> Second, because no one disputes that the human risks are still occurring due to the failure of the institutional controls (fish consumption advisory), and people (including children and women of childbearing years) are still being exposed to high levels of PCBs through the ingestion of contaminated fish from the Hudson River, these are clear performance issues that prohibit EPA from concluding that the remedy “will be protective.”<sup>13</sup> In a cruel twist of fate, despite six years of dredging by GE, we face virtually the same threats as we did before

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<sup>6</sup> See EPA’s First Five-Year Review Report (June 1, 2012), available at <https://www3.epa.gov/hudson/pdf/Hudson-River-FYR-6-2012.pdf>.

<sup>7</sup> Second FYR Report, at 71.

<sup>8</sup> OSWER 9200.2-111, EPA Memorandum re: Clarifying the Use of Protectiveness Determinations for Comprehensive Environmental Response, Compensation, and Liability Act Five-Year Reviews (Sept. 13, 2012) (“2012 FYR Guidance”), at 3, available at <https://semspub.epa.gov/work/HQ/174829.pdf>.

<sup>9</sup> Second FYR Report, at 71.

<sup>10</sup> 2012 FYR Guidance, at 3-4.

<sup>11</sup> See OSWER 9355.7-03B-P, Comprehensive Five-Year Review Guidance (June 2001) (“Comprehensive FYR Guidance”), at p. 4-2, available at <https://semspub.epa.gov/work/HQ/128607.pdf> (defining “remedial actions under construction” as “those actions where physical construction has been initiated, but is not yet complete”; compared to “operating remedial actions” and “completed remedial actions”).

<sup>12</sup> See *id.*

<sup>13</sup> Note also that in the 2002 ROD, EPA acknowledged that institutional controls do nothing to protect ecological receptors and that active remediation, such as dredging, is “substantially more protective” than fish consumption advisories (mostly because fish consumption advisories don’t work on those who don’t follow them). EPA, Record of Decision: Hudson River PCBs Site New York (2002) (“2002 ROD”), at 104, available at <https://www3.epa.gov/hudson/RecordofDecision-text.pdf>.

dredging began; EPA cannot let this stand by issuing a faulty and disingenuous protectiveness determination.

For example, EPA cannot in good-faith state that the “remedial activities completed to date have adequately addressed all exposure pathways that could result in unacceptable risks” as the 2012 FYR Guidance suggests.<sup>14</sup> This is because EPA’s conclusion in the Second FYR Report is that “EPA recognizes the remedy at OU2 to be *not yet protective* of human health and the environment.”<sup>15</sup> I cannot emphasize this strongly enough: **In the Second FYR Report, EPA has actually concluded that the OU2 remedy is not protective and the institutional controls could result in unacceptable risks.** And yet, by some miracle of circular reasoning, EPA has the gall to not issue a “not protective” determination. This is a true injustice to the Hudson River and all those who enjoy or rely on it.

For all these reasons, EPA’s “will be protective” determination in the Second FYR Report is unsupported by both the facts and its own guidance documents.

## **II. The Only Available and Appropriate Protectiveness Determination for the OU2 Remedy is “Not Protective”**

Based on the 2012 FYR Guidance and the facts and circumstances of the Hudson River Superfund Site, the *only* appropriate (and logical) determination EPA can make on the OU2 remedy is “not protective.”<sup>16</sup> In fact, “not protective” is the exact conclusion that the experts at NYSDEC came to in their independent review in 2016.<sup>17</sup> The construction of the OU2 remedy is complete, the remedy is operating, but the human and/or ecological risks are not currently under control and there is evidence of continued exposure to humans.<sup>18</sup> It’s simply not protective.

Importantly, per EPA’s Comprehensive FYR Guidance, “the remedy should be considered as not protective when . . . [a]n immediate threat is present (e.g., *exposure pathways that could result in unacceptable risks are not being controlled*) [or] [p]otential or actual exposure is clearly present or there is evidence of exposure (e.g., *institutional controls are . . . not enforced and exposure is occurring*)[.]”<sup>19</sup> **Both of these “not protective” circumstances**

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<sup>14</sup> 2012 FYR Guidance, at 4. Indeed, to answer Question A, EPA considers whether there are institutional controls in place *and whether they prevent exposure*. See Comprehensive FYR Guidance, at p. 4-1.

<sup>15</sup> Second FYR Report, at 71 (emphasis added).

<sup>16</sup> EPA has “adequate data and documentation” to determine that the institutional controls are not preventing exposure and that human and/or ecological risks are not currently under control. For these reasons, “protectiveness deferred” is not an available determination for EPA. See 2012 FYR Guidance, at 4.

<sup>17</sup> See NYSDEC FYR Recommendations, at 41-42.

<sup>18</sup> See 2012 FYR Guidance, at 5.

<sup>19</sup> Comprehensive FYR Guidance, at p. 4-14.

**are present for the OU2 remedy.** For these reasons alone, EPA’s Second FYR Report *must* determine that the OU2 remedy is not protective of human health and the environment.

Yet, EPA’s analysis suffers yet other fatal flaws which would require a “not protective” determination. One fault in EPA’s analysis is that the remedy does not have to be complete for a “not protectiveness” determination to be issued.<sup>20</sup> As discussed above, EPA is confusing – whether intentionally (which would be underhanded) or unintentionally (which would be negligent) – the importance of the completion of the *physical construction* with completion of the remedy as a whole, and is relying on this improper analysis to support their erroneous determination.

Another problem with EPA’s analysis is that it relies on several *more* decades “*at least*” before human exposure pathways no longer result in unacceptable risks (reaching the 0.05 mg/kg PCBs in fish).<sup>21</sup> The 2002 ROD rejected alternative remedies for OU2 *specifically because* those alternatives would take “decades longer” than the proposed remedy.<sup>22</sup> Thus, by EPA’s very own standards, this additional time of uncontrolled risk and human exposure to PCBs from the Hudson River is objectionable. EPA must not be now allowed to claim “no big deal” to the continued and unchecked exposure of men, women, and children to PCBs for an unknown time as “protective” of human health.<sup>23</sup> Indeed, as EPA’s 2012 FYR Guidance indicates such potential of continued unacceptable risks is a ground for a “not protective” determination.<sup>24</sup> A commitment to “continue to work with New York State to ensure ongoing maximum effectiveness of the [institutional controls]”<sup>25</sup> is simply not enough under the law or the 2002 ROD to ensure protectiveness of human health and the environment.

For all these reasons, EPA is required by its own guidance and the facts and circumstances of the Hudson River PCBs Superfund Site to issue a “not protective” determination for OU2 in the Second FYR Report.

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<sup>20</sup> See Second FYR Report, at 71.

<sup>21</sup> See *id.*

<sup>22</sup> See 2002 ROD, at 102-103.

<sup>23</sup> Also disingenuous would be any attempt by EPA to justify its determination by saying essentially “we knew these institutional controls wouldn’t work in 2002, and they’re not working, so we’re all-good.”

<sup>24</sup> 2012 FYR Guidance, at 5 (“Examples of scenarios that may result in a ‘not protective’ determination include: . . . *Potential or actual exposure* is clearly present or there is evidence of exposure.”).

<sup>25</sup> Second FYR Report, at 71.

**III. EPA Must Immediately Develop Additional Actions That GE Needs to Take to Ensure Protectiveness, Including Requiring an RI/FS for the Lower Hudson River**

It is very clear that more data is needed<sup>26</sup> to determine if fish will recover in the timeframes as agreed upon in the 2002 ROD. Because EPA's correct protectiveness determination in its Second FYR Report must be "not protective," EPA is also required to detail the specific actions that must be taken to ensure protectiveness.<sup>27</sup> As the NYSDEC FYR Recommendations explains, this additional analysis must be undertaken immediately and certainly well before the next Five Year Review begins in 2022. It is extremely likely that such analysis might show that the basic understanding of the relationships between the contaminated sediment, water column, and fish is not what was initially understood when the 2002 ROD was decided and that additional dredging, perhaps even well-outside the current dredged area, will be necessary to prevent continued exposure risks.

Additionally, it is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, after the 2002 ROD was issued, EPA discovered that there was *three to five times more contamination* in the Upper Hudson than previously estimated. Despite this, EPA did not expand the cleanup. As a result, despite six years of dredging by GE, the contamination left in the river is significantly higher than expected. This means that there are likely significantly more impacts and potential exposure risks to humans and the environment, both above and below the Federal Dam at Troy. To that end, and because the 2002 ROD envisioned *absolutely no remedy for the PCBs in the lower 150+ miles of the Hudson River*, EPA must conduct the necessary analysis to determine the appropriate remedy for the Lower Hudson River (as is suggested necessary by studies and reports by federal Natural Resource Damages Trustees and others).

Thus, for all these reasons and the reasons set forth in the NYSDEC FYR Recommendations, EPA must (1) undertake additional and timely analysis (well-before the next Five Year Review) to determine what additional actions (dredging) must occur and where, and (2) undertake an immediate study of downriver contamination and plan for appropriate remedial action, including, but not limited to undertaking an RI/FS for the Lower Hudson River.

\* \* \*

I'd like to conclude by stating that although these comments may be quite strongly worded, they are submitted with absolute respect to the EPA Hudson River Field Office. It's

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<sup>26</sup> To be clear, EPA has sufficient data – as they clearly state in their Second FYR Report – to conclude that the institutional controls are *not* working.

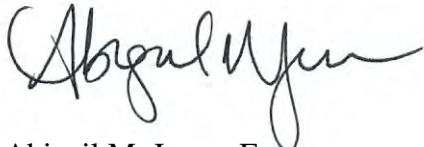
<sup>27</sup> 2012 FYR Guidance, at 5.



been a tough battle getting GE to clean up their mess and I commend the staff in the Hudson River Field Office for getting GE in the river. But that is no excuse to stop inches from the goal line. EPA must not kowtow to GE or others and must do their statutorily-mandated job to ensure that the OU2 remedy is protective of human health and the environment. It is especially critical for EPA to step up in this circumstance, as there may not be any legal recourse for the affected citizens to challenge EPA's utterly incorrect "will be protective" determination. But if there is, I am confident that those environmental watchdogs – such as Riverkeeper, Scenic Hudson, and others – will hold EPA's feet to the fire and fight for the historic Hudson River.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "Abigail M. Jones". The signature is written in a cursive, flowing style.

Abigail M. Jones, Esq.



# More dredging is needed for the Hudson

Justin Jordak [REDACTED]

Mon 8/21/2017 3:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am a resident of the Hudson River valley. I work next to the Hudson every day. Polluters need to be held accountable for cleaning up ALL of their messes.

The remedy for this cleanup is removing all of the contamination not "protecting polluters"!

The remedy is not forgetting about illegally dumped waste and doing just enough clean up to qualify as a "protective measure".

Remove from the report that this remedy is protective. Act protective of citizens well being and health not illegal profits.

Sincerely,

Justin jordak

[REDACTED]  
[REDACTED]  
[REDACTED]

Tue May 30 13:14:25 EDT 2017  
Hope.Brian@epamail.epa.gov  
FW: Hudson River PCB Cleanup  
To: CMS.OEX@epamail.epa.gov

---

**From:** Ellen Jouret-Epstein [REDACTED]  
**Sent:** Tuesday, May 30, 2017 1:10 PM  
**To:** Pruitt, Scott <Pruitt.Scott@epa.gov>  
**Subject:** Hudson River PCB Cleanup

Secretary Pruitt:

I implore you to see to it that the Hudson River is thoroughly cleaned of PCB's by General Electric, who deposited them to begin with. It's important that New York State be granted lead agency for this matter, first of all; and that the EPA issue a 'not protective' Five Year Review determination, as the data indicates that the cleanup so far is 'not protective' of human health and the environment. There needs to be testing of residual PCB's so that the full dimensions of the needed further clean-up are known. GE, and the EPA, must be accountable on this issue.

Thank you,

**Ellen Jouret-Epstein**

[REDACTED]

[REDACTED]

[REDACTED]

# EPA Second Draft Year Review

Chris Joy [REDACTED]

Fri 9/1/2017 2:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

I am christopher joy a resident of beacon (a hudson valley river town). My family plays at long dock park which is right on the river at the beacon train station.

The EPA must remove from the report the phrase "the remedy will be protective."

The report must call for additional dredging of PCBs in the upper Hudson.

The report must call for an investigation of contamination in the lower Hudson.

Sincerely,

Christopher joy  
[REDACTED]  
[REDACTED]  
[REDACTED]

# PCB Cleanup ~ EPA

Peter Jung [REDACTED]

Fri 8/4/2017 12:41 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Dear Mr. Klawinski,

As a property owner, business person, and resident of the Hudson Valley for 37 years, I urge that your agency take swift action to force General Electric to do a thorough and responsible cleanup of the toxic mess they left in the Hudson River. Failure to hold corporate polluters responsible will only encourage more of the same abusive behavior.

Thank You,

Peter Jung  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Elissa Jury [REDACTED]

Wed 8/30/2017 3:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am a [REDACTED] that for the past 10 years has used the Hudson River as a laboratory to study the compatibility of industry and human activity over our 400 year history in our integrated Biology unit. I live work and play less than 10 miles from the shores of the Hudson.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

I trust you will continue to remediate and research to improve this river that encapsulates the birthplace of our country. As an involved citizen I want you to continue to make this river a hallmark of progress and the ability to work together using federal, state and local funding for improvement. Please fully fund the Hudson to continue the progress and unite users for industry, recreation, and our nations history to move forward

Sincerely,

Sincerely,  
[REDACTED]  
[REDACTED]  
[REDACTED]



**SCENIC HUDSON**



**RIVERKEEPER**  
NY's clean water advocate

[scenicudson.org/pcbs](http://scenicudson.org/pcbs) [riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)

# #HealthyHudson



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

**RECEIVED**  
AUG 11 2017

Dear Director Klawinski,

2205-119878

As a 35+ year resident of the Hudson Valley, I am seriously concerned about your proposal 2nd 5 year review. The report must state that the remedy is not protective. As you know, NOAA has said that your plan will not meet its 18<sup>th</sup> remediation goals. I ask that you state that the proposed clean up is not protective.

Sincerely,

Name:

Address:

E-mail:

THOMAS KACISZ  
[Redacted]



Dear

Please protect the Hudson River. I have lived along the Hudson for 75 years! The upper 50 miles must be cleaned and protected. The lower 150 miles requires effective, functional remediation, removal of contaminants and protection. I want to eat fish weekly from the Hudson!

Sincerely,

Name:

Olivia L. Kachush

Address:

E-mail:



scenichudson.org/pcbs riverkeeper.org/pcbs

# #HealthyHudson



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

RECEIVED  
AUG 10 2017

# More dredging is needed for the Hudson

Robert Kalman [REDACTED]

Mon 8/21/2017 11:35 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

The work is not done! Please insure that the EPA actually does what it's moniker infers: Protects the Environment. Especially from predatory and greedy companies who see the earth as a minor hurdle to bottom line items and egregious profits. Do the work.

Sincerely,

Robert Kalman

[REDACTED]  
[REDACTED]  
[REDACTED]

# 5 Year Review of Hudson River PCB Cleanup by GE

Sara Kaminker [REDACTED]

Tue 6/6/2017 10:50 PM

To: EPAHRFO@outlook.com <EPAHRFO@outlook.com>;

To Whom It May Concern:

I have just finished reading an article in the Yonkers and Mount Vernon Express discussing the findings of the above-referenced report. I am very disappointed to find that no further dredging will be required by G.E. According to your report the remedy is "not yet protective of human health and the environment". It will take 8 more years, according to your report to discern a trend towards the river's recovery. That is not acceptable.

G.E. needs to continue its efforts to re-mediate the damage it has done. A half-completed job is not acceptable. The river belongs to all of us. We want it healthy, for the living creatures in it, the residents around it and for the greater good of the environment.

I protest this determination. The work must proceed.

Sincerely yours,  
Sara Kaminker

[REDACTED]

# HUDSON RIVER LAST MILE

Carole Kane [REDACTED]

Sun 8/20/2017 8:09 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Please complete the project on THE HUDSON RIVER CLEANUP PROJECT.

Go the extra mile to complete this work! Let this be the National model for the country.

GE is so close to achieving its goal. They will have surely regained their pride & reputation.

Future generations will be so thankful.

Sincerely,  
Carole A. Kane

Sent from my iPhone

Dear Director Klawinski,

Please get the rest of the PCBs  
out of the Hudson quickly!

Sincerely,

Name:

Edith Kantrowitz

Address:

E-mail:



scenichudson.org/pcbs riverkeeper.org/pcbs



# #HealthyHudson

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SEP 01 2017



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# Second Five-Year Review of Hudson River Superfund Site

Mevrian Thomas [REDACTED]

Thu 8/31/2017 9:50 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Dear Mr. Klawinski:

As a long-time NYC resident who loves and is concerned about the Hudson River, I wish to make the following comment about EPA's report on the 2nd Five-Year Review of the Hudson River PCB Superfund Site Cleanup.

The report on this review must say that "the remedy is not protective." EPA must remove from the report the phrase stating that "the remedy will be protective" of human health and the environment. It is not sufficient to rely on the idea that the remedy will be protective at some point in the distant future. It is ridiculous to say that we would have to wait decades to be able to eat one fish meal per week from the river.

The cleanup is already years behind schedule, and yet EPA claims it needs another eight years of data to understand if it is working. But we can already see that it is not working. Data collected in 2016 shows an average concentration of PCBs in fish of 1.3mg/kg. This is almost 300% higher than the first remediation goal, making it unreasonable to expect that toxicity in the fish will decline dramatically enough to meet that remediation goal in 2018. Unfortunately, this information appears to be barely evident in your report.

During Phase One of the cleanup, EPA discovered that it had underestimated the amount of PCBs in the river, but it did not use this information to modify the cleanup goals. This is unacceptable. With two to three times as many PCBs remaining in the river than originally expected, EPA and GE must do more to clean up the river. Additional dredging of the upper 40 miles of the Hudson River is necessary, as well as further investigation of the state of the lower 150 miles of the Hudson River, and investigation of what would be necessary to remediate that part of the river.

The EPA must also give more weight to studies by federal and state agencies that challenge its findings. NOAA has said in a peer-reviewed study that recovery will not be reached as anticipated due to the elevated levels of PCBs, equivalent to several Superfund Sites, remaining in surface sediment. It is shocking that this amount of PCBs is being left behind. NOAA has said that it anticipates that cleanup targets will be met approximately 60 years later than EPA projections. This, again, is unacceptable.

Another problem is that EPA used 30 year old data about fishing activity to assess the impacts on people who fish in the river. The reality is that many new groups of people have moved into the Hudson Valley, particularly in the urban areas, and many of these people are fishing the Hudson to provide protein for their diets, and are eating contaminated fish. It is disappointing that these new realities have not been taken into account.



Americans want a healthy Hudson River as soon as possible, not 60 years into the future. General Electric must continue to be held accountable for the cleanup of this massive Superfund Site. They must continue the cleanup, and if current dredging technologies are not able to do the job, then they must be required to explore and research new technologies.

The cleanup cannot be declared complete by the EPA until the PCB contamination in the entire Hudson River reaches a level that does not threaten human health and the environment.

Sincerely,

Edith Kantrowitz







**SCENIC HUDSON**

[scenichudson.org/pcbs](http://scenichudson.org/pcbs)



**RIVERKEEPER**  
NY's clean water advocate

[riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)

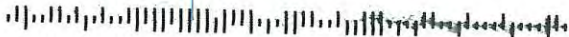
# #HealthyHudson

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SEP 01 2017



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0003173553 AUG 29 2017  
MAILED FROM ZIP CODE 12601

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



Tue May 30 13:16:09 EDT 2017  
Hope.Brian@epamail.epa.gov  
FW: Hudson River Cleanup  
To: CMS.OEX@epamail.epa.gov

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**From:** Michelle karell [REDACTED]  
**Sent:** Tuesday, May 30, 2017 12:57 PM  
**To:** Pruitt, Scott <Pruitt.Scott@epa.gov>  
**Subject:** Hudson River Cleanup

- “We’re closer to having a cleaner Hudson River, but action is needed to remove more toxic PCBs and get the job done right, once and for all!”
- “EPA must give New York State ‘lead agency’ status (responsibility for additional PCB cleanup). Only then will we realize the vision of a restored Hudson River.”
- “Please issue a ‘not protective’ Five Year Review determination. As Riverkeeper and government agencies — DEC, NOAA, USFWS, and the New York State Attorney General — have all pointed out, the data indicates that the cleanup performed by GE is ‘not protective’ of human health and the environment.”
- “EPA must require GE to undertake comprehensive sampling to determine as soon as possible what more needs to be done to meet the cleanup goals.

# EPA Second Draft Year Review

George Katopis [REDACTED]

Mon 8/21/2017 3:30 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am a resident, home owner, and tax payer at the Town of Poughkeepsie, where I have lived since 1987. I have enjoyed the beauty and sailing on Hudson and I feel this is a great resource not only for entertainment but also for tourism that is vital for the economy of the Mid-Hudson Valley. Therefore to me it is self evident and necessary that additional dredging of PCBs in the upper Hudson. I believe an investigation of the contamination in lower Hudson is the only reasonable position that the report should indicate. Finally unless the report specifically specifies that " the remedy will be protective" it will not be the paper is written on and will constitute a licence for continued pollution of Hudson .

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

George A. Katopis

Sincerely,

George Katopis  
[REDACTED]  
[REDACTED]  
[REDACTED]

# Comments on EPA Hudson River decision

Debbie Peck Kelleher [REDACTED]

Fri 9/1/2017 3:37 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

I am writing in support of reopening the dredging of the Hudson River. I am resident of the Upper Hudson Valley, and am appalled at how the EPA has treated us. It is almost as if the EPA was dragged kicking and screaming into the dredging. First, you let GE pick a remedy that caused substantial resuspension of PCP's, then you dismantle the dewatering facility long before you have made a decision on whether to continue the dredging. You should be protecting us, the residents of the valley, not GE's bank account. You have no plan to address all the PCB's that have migrated onto land with the spring floods.

You need to step up and take the actions the Superfund law requires. You have are packing up and leaving us with fish we can't eat for the next 55 years. You are allowing the Nation's longest Superfund site to remain, only slightly cleaner then when you arrived. You were charged with removing these hazardous wastes from our community, instead you are walking away hand in hand with GE. All the PCB's that are on our shores, canals beds, and the navigational channel of the barge canal are still there.

You, the Federal Government, have the power under CERCLA to hold GE responsible in getting the PCB's out of our communities. You need to ensure that we are safe. That walking or living on the shore the River is safe. CERCLA give you tremendous legal powers, use it to protect us!!

You are walking away from us, and shrugging your shoulders has we try to figure out how to do safely dredge the Barge Canal.

I am asking the EPA to force GE to continue the dredging until we can eat the fish in my lifetime, and we can use the Barge Canal, and we use the old canal beds. Do not let GE just walk away and make this our problem. CERCLA requires you to make this the remaining cleanup GE problem.

Thank you  
Deb Peck Kelleher

[REDACTED]  
[REDACTED]

William J. Kelleher

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JUL 10 2017

EPA Region 2 Director  
Gary Klawinski  
187 Wolf Road Suite 303  
Albany NY 12205

July 1, 2017

**RE: Saving the Hudson River**

Dear Mr. Klawinski:

This letter contains recommendations concerning the recent EPA Report on the results of the \$1.7 billion dollar project to remove PCBs from the Upper Hudson River. EPA and NOAA ignored the large amounts of deposits containing PCBs that were placed behind dykes and islands when the navigational channel in the Lower Hudson was deepened and enlarged to make the Port of Albany into an international seaport. As a result the Upper River dredging did more harm than good because the \$1.7 billion would have been better spent on removing PCBs from the shores of the Lower River.

EPA has given up on future expenditures of large sums of money because the Upper River dredging project did not cause a reduction of PCBs in fish in the Lower Hudson. EPA has taken the position that it will take over 50 years of natural flushing out of PCBs before it can make a determination as to how much fish can be eaten. In other words EPA's present position is to wait and see!

EPA has allowed the US Army Corps of Engineers (ACE) to destroy Houghtaling Island at New Baltimore in the Lower River because it was and is now being used to dispose of PCB wastes from harbor improvements and routine cleaning of the navigational channel.

This writer disagrees with EPA's positions because it is possible to remove the PCBs containing deposits on the shorelines of the Lower River including the wastes at Houghtaling Island. The cost could be over \$4 billion.

Recommendations

- 1 -EPA must establish a team of qualified Civil Engineers to study maps and reports in Federal and State archives to determine the location, area and depth of all disposal sites containing PCBs in the Lower Hudson. Numerous soil samples must be taken. The cost for removal should be determined.
- 2-Most of the PCB deposits from Troy to Kingston probably can be removed by land excavation. Dredging may be necessary below Kingston.
- 3- Immediate action must be taken because the ACE no longer maintains decaying wood dykes. Hence PCB deposits behind dykes are slowly being returned to the River. The longer one waits to remove the PCB deposits the greater the cost.
- 4- GE must be held responsible for all costs.

5-EPA should contract with the NYS Education Department to study the history of how and when the navigational channel in the Lower Hudson River was enlarged and deepened.

6- The rescue of Houghtaling Island should be included in removal of all PCB deposits.

7-The official policy of the US is to restore the River to the way it was in 1813. The costs of restoration are going to be very high. As examples, all of Henry Hudson Park and Schermerhorn Island in the town of Bethlehem, will be under water. The tidal Binnen Kill, a man made ditch, will also be under water at high tide.

#### Robert H. Boyle on the Damage Done to the Lower Hudson River Caused by the Deepening and Widening of the Navigational Channel in the River

Robert H. Boyle, a journalist and sportsman, passed away at the age of 88 in May of this year. He was considered by many to be the best authority on the history of the damage done to fish and wildlife in the Hudson River by private and governmental entities promoting navigation on the River. The following are quotations from his 1969 book **The Hudson River: A Natural and Unnatural History**:

"From the Troy Dam down to the city of Hudson, a distance of some thirty miles, the river is laced with sandbars, islands and marshes. These have been formed by natural sediments which settle out in the tide water after having been carried downstream from the Adirondacks. Castleton, fifteen miles south of Troy, was the site of the so-called Overslaugh Bar which was a hindrance to navigation well into the nineteenth century. In the 1860s, the state and federal governments embarked upon a long term project of dredging the bar, deepening the main channel, and constructing dikes along the islands and banks of the river."

"In the 1960s, the Army Corps of Engineers dredged the ship channel to Albany to a depth of 34 feet and a width of 400. During the dredging, the river was so laden with silt that it was the color and consistency of gravy. Great amounts of the spoils were simply dumped on flats and islands, and so now near Castleton there are Sahara deserts of silt three stories high with dead tree branches poking through."

**"Even a dredge operator I met was angry. "I hate to do it," he said. "I'm a duck hunter myself, but you can't fight the government." Once, when I was in a badgering mood I asked a Corps official where the spoil was placed. "In disposal areas" he said. I asked, "such as where?" He replied, "Oh, for example, there was an unused [sic] little stream, so we dumped there."**

#### Dredge Disposal Sites in the Lower Hudson Contaminated With PCBs

GE started to discharge PCBs into the River in 1947. Therefore all spoils removed from the navigational channel in the Lower River that were deposited on the shores of the River from 1947 to present contain PCBs. Hydraulic dredging was used, the maximum distance for disposal was 2500 feet. The concentration of PCBs in the spoils from 1947 to 1976 were much higher than they are today because raw sewage solids tend to scavenge out the PCBs. Raw sewage solids were in the River from 1840 to 1976 when sewage treatment plants began operation.



Also there were miles of bed rock that had to be blasted out to make the channel deeper and wider. Cleaning out a bedrock channel resulted in spoils with high concentrations of PCBs.

#### About the Author

I have a long history concerning the pollution of the Hudson River. I will only give the highlights. I have a Bachelor of Civil Engineering Degree from RPI and a Master of Civil Engineering Degree from Purdue. My first job after graduate school was teaching Sanitary Engineering, Soil Mechanics and Foundations at RPI from 1953 to 1958. During this time a senior professor at RPI was an advisor to the US Army Corps of Engineers on the Hudson River dykes and on hydraulic dredging.

After retirement from DEC in 1982 and Norwich University in 1986 I paid little attention to the town of Bethlehem's drinking water problems. However when an old fashioned infiltration gallery at Schermerhorn Island was built in 1996 I became deeply involved in a lawsuit and settlement agreement. One result is I made a detailed investigation of plans and reports in the State and Federal Archives that had to do with the navigational channel in Henry Hudson Park and Schermerhorn Island.

#### Final Statement

The greatest case of engineering malpractice in the history of the US is the failure of levees in New Orleans when hurricane Katrina hit. The US Army Corps of Engineers and its consultants did not know how to design sheet piling walls to increase the height of levees. The second greatest case of the lack of good engineering in the history of the US is the ignoring of PCBs that were deposited on the shores of the Lower Hudson River when the navigational channel was deepened and enlarged.

**The total lack of consideration of the history of the navigational channel in the Lower Hudson was the single most important factor leading to the false conclusion that dredging of the Upper River will cause a decline of PCBs in fish in the Lower River.**

Sincerely yours,



William J. Kelleher

Copy to: Basil Seggos NYSDEC, NOAA, USFWS, Hudson River Fishermen's Association, Riverkeeper, Scenic Hudson, Hudson River Sloop Clearwater, NRDC, Sierra Club Governor Cuomo, Senators Schumer and Gillibrand, Congressmen Tonko, Maloney, Fasco, Mayors Sheehan, Rolison, Times Union, Poughkeepsie Journal, Daily Freeman, Schenectady Gazette, Mid Hudson News, others upon request

Willelshyer

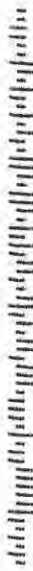
ALBANY NY 12205

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EPA Region 2 Director  
Gary Glowinski  
187 Wolf Road Suite 303  
Albany NY 12205

12205-113878



Dear Director Klawinski,

I'M OUT ON THE WATERS OF THE HUDSON AT  
LEAST ONCE A WEEK, FROM OUR CANOE/KAYAK  
BOATHOUSE IN NOTHERN MANHATTAN. ALL  
SUMMER WE TAKE KIDS FROM THE BRONX OUT  
TO EXPERIENCE THE RIVER. PLEASE ORDER  
MORE CLEAN-UP BY GE + STATE IN YOUR  
REPORT THAT, SO FAR, THE REMEDY IS NOT  
Sincerely, PROTECTIVE OF HUMAN HEALTH

Name: LAIRD KELLY

Address:

E-mail:



**SCENIC  
HUDSON**

[scenichudson.org/pcbs](http://scenichudson.org/pcbs) [riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)



**RIVERKEEPER**  
NY's clean water advocate

DV DANIELS NJ 070

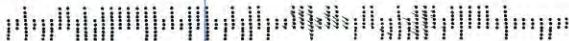
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# #HealthyHudson

**RECEIVED**  
AUG 21 2017

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# More dredging is needed for the Hudson

Quinn Kelly [REDACTED]

Mon 8/21/2017 3:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am a resident of Brooklyn, NY who values the health of our local waterways.

Please make sure the Hudson River Superfund cleanup is completed in full to ensure the ecological health of the Hudson River. We need a full study of river contamination in order to determine what appropriate remedial action will entail.

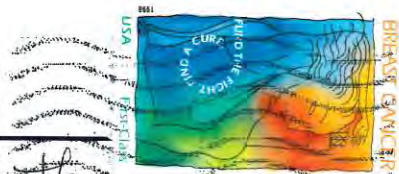
Sincerely,

Quinn Kelly

[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

ENVIRONMENTAL PROTECTION AGENCY



As a regular user of the Hudson River and [REDACTED] I believe it is imperative to continue the clean up of BPAs in both the upper and lower river. GE is responsible and has the means. They should continue to be held accountable.

Sincerely,

Name: MARCI KENNEDY

Address: [REDACTED]

E-mail: [REDACTED]



**SCENIC  
HUDSON**

[scenichudson.org/pcbs](http://scenichudson.org/pcbs)



**RIVERKEEPER**  
NY's clean water advocate

[riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)

# #HealthyHudson

**RECEIVED**  
AUG 24 2011



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

# More dredging is needed for the Hudson

John King [REDACTED]

Mon 8/21/2017 3:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

My name is John King and I am a resident of Dutchess County. I grew up on the Hudson River in Cruger's New York. I spent a lot of time sailing and swimming in the Hudson and undoubtedly I was exposed to PCBs. Perhaps this is why [REDACTED]. Please do not let our children and future generations be exposed to these dangerous chemicals. I urge you to support a clean environment and mandate General Electric to finish the cleanup of the Hudson River.

Sincerely,

John King  
[REDACTED]  
[REDACTED]  
[REDACTED]



# Finish the job of cleaning the Hudson

Laurence Kirby [REDACTED]

Mon 8/21/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am a resident of Woodstock and regularly visit the Hudson for recreation, to catch a train along its banks, and to visit notable sites such as the Roosevelt estates and Dia Beacon. The current state of clean-up of the Hudson River is not "protective" -- it leaves at least twice as much PCBs in the river as projected, and our communities and children, as well as other visitors to these destinations, remain at risk. More dredging, properly controlled, is needed to make the clean-up effective. The EPA's job is to protect the environment, not to bolster the bottom line of the culprit in this awful mess, GE.

Sincerely,

Laurence Kirby

[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Rachel Kish [REDACTED]

Tue 8/22/2017 11:11 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am a resident of Greenwich, NY, and my family (including two children) regularly boats and fishes in the Hudson. The dredging project should not be terminated. Please continue the dredging of PCBs until our water is safe. Please investigate the contamination of the lower Hudson. There is a problem, and there is a viable solution. Do what is right and required. It is irresponsible to do otherwise.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Rachel Kish  
[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Cary Kittner [REDACTED]

Mon 8/21/2017 11:23 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I live in Barrytown, which sits on the Hudson River in the township of Red Hook in Dutchess County. I have been following the GE cleanup since it was first proposed, and GE was trying to convince the public that the PCBs could be dealt with on site by introducing bacteria into the river to decompose the PCBs. Now that GE wants to be done with this cleanup, it is important that we make sure that they actually complete the job. As long as there are still PCBs in the river, then the job is not done. GE essentially stole the edible fish from the river for decades and now they want to steal more edible fish for another few decades. Please make them clean up every last PCB.

Apparently the scope of the project was underestimated at the time the dredging plan was agreed upon. That doesn't relieve GE of its responsibility to do a complete job. It isn't complicated. They made the mess and it's their job to clean it up to the specifications of PCB levels that were agreed upon to be safe. They need to keep dredging.

Sincerely,

Cary Kittner  
[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Caroline Klapproth [REDACTED]

Mon 8/21/2017 12:03 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I live in Troy, [REDACTED]  
[REDACTED]

Please cleanup what Mostly Industry has done to "Our Mighty Hudson" Cities have also contributed ti this mess And Industry and Municipalities must work together with us.

Sincerely,

Caroline Klapproth

[REDACTED]  
[REDACTED]  
[REDACTED]

# FW: Hudson River cleanup

Klawinski, Gary J <Klawinski.Gary@epa.gov>

Wed 9/6/2017 9:47 AM

To: 'epahrfo@outlook.com' <epahrfo@outlook.com>;

-----Original Message-----

From: Amy [mailto:████████████████████]

Sent: Tuesday, August 29, 2017 10:42 AM

To: Klawinski, Gary J <Klawinski.Gary@epa.gov>; Pruitt, Scott <Pruitt.Scott@epa.gov>; info@riverkeeper.org

Subject: Hudson River cleanup

To Mr. Klawinski:

I have been a resident of New York since 1986, but I first heard about GE and the PCB contamination as a WV resident in the late 70's and have boycotted their products ever since. We know that this is not an issue that is going to be resolved in 10, 20 or even years. PCB's are such a pervasive and dangerous contaminant that I believe if we do everything we can now, it still might even take 100 years to get to a clean river that we can enjoy without reservation, and that we can add to a heritage that we leave to future generations.

Although I have been an ardent environmentalist my whole life, I can't assume that I know what is best. I know many say dredge more, and maybe that is the answer. I do know that the job is not done, and that GE needs to continue to be held accountable for seen and unseen issues that will occur over the next many years. I attended the June meeting in Poughkeepsie, and I was enlightened to hear the gentleman who spoke about the cost of getting rid of dredging material at his marina. I never would have thought of that issue, and I am sure many situations are going to arise besides the clean up itself of economic hardships to citizens who had nothing to do with this contamination who should not have to suffer more because of GE's callous disregard for the river and the surrounding environment. (for example, a dedicated fund to help people like that gentleman.)

So, it is my firm opinion that GE and the EPA should continue to work to clean up our beautiful historic river for many years to come. I hope you will hear our voices, as well as the voices of the people, plants and animals that can't speak for themselves, and make our river clean again.

Thank you very much.

Amy Kletter

████████████████████  
████████████████████

# EPA Second Draft Year Review concerning the Hudson River

Vladimir Klimenko [REDACTED]

Wed 8/30/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

As a resident of Sleepy Hollow and someone who spends considerable amounts of time boating on the Hudson, I am writing this letter to express my concerns about the incomplete nature of the work done to remove PCBs from river sediments.

The dredging project in the Hudson River has not sufficiently eliminated the toxic dangers faced by communities and wildlife downriver. Current contamination levels are not where they need to be in order to benefit the lower Hudson region. It is therefore reasonable to conclude that the work done to date is "not protective."

The EPA needs to pursue a more comprehensive cleanup effort. It is well known that PCB levels after the remedy are 3-5 times higher than was previously assumed. Based on what we now know, this is a significantly higher risk than the original assumption of some residual PCBs after the remedy. This calls for a more aggressive effort on the part of the EPA.

Among other things, we need a comprehensive study of existing contamination levels in the lower Hudson region. We cannot expect fish stocks to properly recover without appropriate action. In order to do that, the EPA must follow its procedures for Five-Year Reviews. This requires proper, credible studies by state and federal bodies.

I know that I speak for many of my neighbors in writing this letter. I urge you to do the right thing and follow through on cleanup efforts to achieve the result that we all need.

Sincerely,

Vladimir Klimenko  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

I am a long time NY state resident  
who is very concerned about continued  
PCB contamination of the Hudson River.

Please call for more dredging of  
the upper Hudson and monitoring and  
testing of the lower Hudson.

Sincerely,

Name:

Pete Klosterman

Address:

E-mail



scenichudson.org/pcbs riverkeeper.org/pcbs



# #HealthyHudson

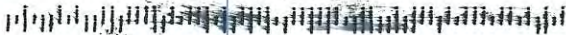
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Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205





# FW: PCBs OUR TOXIC LEGACY TO OUR CHILDREN AND FUTURE GENERATIONS

Klawinski, Gary J <Klawinski.Gary@epa.gov>

Tue 8/15/2017 2:56 PM

To: 'epahrfo@outlook.com' <epahrfo@outlook.com>;

Cc: Romanowski, Larisa <Romanowski.Larisa@epa.gov>;

---

From: [REDACTED]  
Sent: Thursday, July 20, 2017 1:22 AM  
To: Klawinski, Gary J <Klawinski.Gary@epa.gov>  
Subject: PCBs OUR TOXIC LEGACY TO OUR CHILDREN AND FUTURE GENERATIONS

As we observe the slowly unfolding drama in Washington, it is no surprise that we now hear that the EPA has abandoned us.

The EPAs lack of responsibility to uphold a clean environment and to enforce the courts order is standard operating procedure in todays new world order.

Be honest. Make General Electric clean up the toxins they left while making yearly profits from manufacturing.

For the new EPA, GE profits – the people get poisoned – and society is completely corrupted.

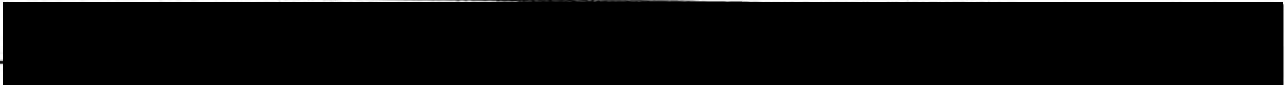
America the great is a distant memory.

Sent from [Mail](#) for Windows 10

**COMMENT SHEET — 2017 Five Year Review Report**  
**Hudson River PCBs Superfund Site**

Name (Please Print): WAYNE KOCHER

Agency/Organization: SELF

Address: 

Written comments must be postmarked by September 1, 2017

COMMENTS:

I stopped fishing the Hudson River in 2001 with over 24 years of serious hours on the Hudson. Seeing the lesions and tumors on the fish and some wildlife I decided to quit fishing and become more of an environmentalist to give back to this precious river. The dredging logging programs have showed me that migratory fish, wildfowl, crabs in the Hudson and distribute the PCB's up as far as Nova Scotia, and as far south as the Carolinas, during their migrations, also crabs and birds and migratory water fowl eat and distribute PCB's wherever they end-up. When I worked for metro-nord and Conrail in Croton on Hudson N.Y. I had a letter from the DEC saying 140 thousand surface gallons were left at the RR site taken over by Halfmoon Bay Condo project year ago. These were PCB's from a poor RR clean up project. Please continue dredging as soon as possible. Thank you sincerely

Wayne M. Kocher

Written Comments can be sent by mail or email to:

Gary Klawinski, Director  
EPA Region 2, Hudson River Office  
187 Wolf Road, Suite 303  
Albany, NY 12205  
email: epahrfo@outlook.com

P.S. one year the Troy dam was loaded with Blue Crab crabs eating high toxic levels of whatever fish, then they come down river. I say no eating of crabs is safe. Thank you



WESTCHESTER NY 105

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Gary Klavinski  
Director  
EPA Region 2, Hudson River Office  
187 W 9th Road, Suite 303  
Albany N.Y.  
12205

12205-113878



# EPA 5 year review of Hudson River PCB's

Susan Koff [REDACTED]

Thu 7/6/2017 10:09 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Dear Mr. Klawinski, EPA Region 2 Director:

In response to the forum on the status of the 5 year review of the clean up of the Hudson River, I am urging you to require further remediation of the still present PCB's by General Electric.

According to your report, "human health and ecological remedial goals have not yet been reached (and) they are expected to be reached in the future, when the remedy - including the natural attenuation component - is complete." According to your report, attenuation is actually the dilution of the concentrations of PCB's to other areas, likely further downstream, to reduce toxicity. Great - studies during the next 8 years will be conducted to see how toxic the river becomes over time in Germantown, Clermont, Rhinebeck, Poughkeepsie.....!

Although you stated that it would be impossible to remove all the PCB's from the Hudson River, why have GE stop now, when so much more of the PCB's were found as a result of the dredging? Does it make sense to take a wait and see attitude when the technology is available to do a better job now. Are you waiting to see how many more cancers develop over the next 8 years? GE started dumping PCB's into the Hudson river in 1947. 35 years later, in 1984, the Hudson River was declared a Superfund site. I moved to Rhinebeck in 1983 and I remember GE's pervasive ad campaign to avoid the clean up. They spent millions of dollars avoiding their responsibility when that money could have been spent in remediation....

It wasn't until 2011 that the dredging began - 27 years after the Hudson River was declared a Superfund site. Now we know how dangerous PCB's are and we don't want to live with them any longer. We don't want them in our drinking water, in our fish, in our sediment, in our air or in our bodies. And we don't want them passed on to other generations.....

We don't want to wait for more studies to determine if what GE has done is sufficient. THEY CAN DO MORE NOW. Why wait?  
Are we trying to save GE from the cost of remediation?

I fear that the Environmental Protection Agency has lost its way and forgotten the important mandate it has to PROTECT our health, safety and future on this planet. Protection does not come from a wait and see attitude; it requires action sooner rather than later.

Very truly yours,  
Susan Koff

[REDACTED]

# EPA Second Draft Year Review

Laura Kohlmann [REDACTED]

Tue 8/22/2017 10:00 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I have been a resident of Newburgh, NY in Orange County for 36 years, and of New York State my whole life. My husband and children were born and raised in Newburgh. We kayak on the Hudson, have camped along the Hudson, and enjoy all of the activities that this beautiful river affords us.

Two things we haven't been able to do though, are swim in its waters and eat its fish. We are citizen scientists who count fish and eels for the DEC yet we do not feel it is safe to eat them.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

If you have ever been to the riverfront parks, such as Kowawese, you would see that children are playing in the waters. You must protect our children. Please finish the job of cleaning up our beautiful Hudson River. We should be able to swim in its waters and eat its fish.

Thank you.

Sincerely,

Laura A. Kohlmann  
[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Phil Kovacs [REDACTED]

Mon 8/21/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

As a former resident of Saugerteis 3 generations of my family grew up on the river. I applaud the work that has been done. I have seen the return of wildlife and human activity.

Finish the job!

The river is incredibly beautiful and alive, let the next generation enjoy it to the fullest. GE must clean up their mess. It I our river not theirs. If they were caught spraying graffiti on my house the courts would have the totally remove it or have to pay to have it done

Sincerely,

Phil Kovacs

[REDACTED]  
[REDACTED]  
[REDACTED]

**COMMENT SHEET — 2017 Five Year Review Report**  
**Hudson River PCBs Superfund Site**

Name (Please Print): Patricia Kram

Agency/Organization: private citizen

Address: [REDACTED]

**Written comments must be postmarked by September 1, 2017**

COMMENTS:

By all means the dredging and clean-up of the Hudson River needs to continue.

Knowing that the hazardous wastes in the river are dangerous and threaten human life, Why would you leave these toxins in the river???

In looking at the levels of toxins in fish and other animal life currently, to wish it away is unacceptable.

Humanity can not survive without clean, fresh water. This is a fact and shame on any company or organization that compromises or ignores the importance of this superfund dredging work and related environmental tests.

Thank you.

**Written Comments can be sent by mail or email to:**

Gary Klawinski, Director  
EPA Region 2, Hudson River Office  
187 Wolf Road, Suite 303  
Albany, NY 12205  
email: epahrfo@outlook.com

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Tary Klawinski, Director  
EPA Region 2, Hudson River Office  
187 Wolf Road, Suite 203  
Albany, NY 12205

12205-113699





# EPA Second Draft Year Review

Pam Krinsky [REDACTED]

Mon 8/28/2017 4:10 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I live in Highland, between Poughkeepsie and New Paltz. I sit on my town's (Iloyd), Democratic Committee and I am running for County Legislature. I moved to this region in large part, because of the amenities the Hudson River offers. I love to watch nature there. About two months ago, I attended the information session at the Grand Hotel, and I must say, I was and am extremely disappointed in the complacent acceptance and tacit approval of the EPA in NOT forcing GE to complete its clean-up of the Hudson River. The way it was stated is that the EPA is NOT protecting the rights of area dwellers and fisherman, or the creatures living in and near the River. The phrase, "the remedy will be protective" has no basis in the real way the EPA is allowing GE to do nothing except sit around and watch. It's unfair to the people and the wildlife that for 80 years, at least, we cannot eat fish from our river more than once a month. Why SHOULD that be acceptable?

It is absolutely imperative that the Upper Hudson continue to be dredged and that same report must also call for an investigation of the contamination in the lower Hudson.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Pamela B Krinsky  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Thomas Kryzak [REDACTED]

Tue 8/29/2017 3:10 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

My name is Tom Kryzak, I live in 14 miles from the river in Albany County. Please real that I have met with you, Dave King and your staff since before the dredging project began. Join the DEC and the people of NY State and demand that GE finish dredging the job. PCB's remain, the remedy is not protective of human health, wildlife or the environment.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Thomas Kryzak  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Peggy Kurtz [REDACTED]

Tue 8/22/2017 11:30 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I'm writing to urge you to require GE to do whatever is needed to finish the job of cleaning up the PCBs. It is unacceptable for the rest of us to have to live with the damage from their operations.

Allowing them to exit before the clean up is completed sets a negative precedent. Corporations must know that EPA will hold them fully accountable for the full price of the harm they do to our environment.

Peggy Kurtz  
[REDACTED]

Sincerely,

Peggy Kurtz  
[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

A.Norman Kvam [REDACTED]

Mon 8/21/2017 3:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

If it was determined that "starting to dredge"

Was the right way to start resolving the river's condition, .....why would there be any debate on whether or not it would be a good idea to finish, rather than quitting when is only 75% complete?????...

Finish the job!

Sincerely,

A norman kvam

[REDACTED]  
[REDACTED]  
[REDACTED]

# Hudson River Cleanup - EPA Second Draft Year Review

Marc Lallanilla [REDACTED]

Fri 9/1/2017 9:05 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Mr. Klawinski:

The Hudson River is America's Nile, and is woven into the economic and cultural fabric of the entire country.

As a resident of the Town of Newburgh, who also owns a business in Poughkeepsie, I understand how vital the health of the Hudson River is to all the people in the Hudson River Valley.

Current levels of PCBs are too high, and the EPA has an obligation to the citizens in Region 2 -- and the natural communities -- to finish the cleanup of PCBs in the Hudson River.

At a minimum, I urge you to begin a study of downriver contamination and develop a plan for remedial action.

Environmental action once saved from extinction the Bald Eagles that are now plentiful on the Hudson River, and similar action can preserve the river for future generations.



Many thanks,

Marc Lallanilla  
[REDACTED]

# Fwd: Dredging the Hudson

Romanowski, Larisa <Romanowski.Larisa@epa.gov>

Thu 8/31/2017 7:11 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Begin forwarded message:

**From:** Frank Lancellotti [REDACTED]  
**Date:** August 31, 2017 at 6:05:23 AM EDT  
**To:** "Romanowski.Larisa@epa.gov" <Romanowski.Larisa@epa.gov>  
**Subject:** Dredging the Hudson

Enough is enough. I do not support further dredging of the Hudson for PCBs. The environmentalists will NEVER be satisfied. Their efforts have made New York business unfriendly. We no longer get manufacturers like auto companies that pay good wages because of activities like their efforts to force GE to continue to dredge. Just look at all the auto manufacturing jobs in South Carolina.

Sent from [Mail](#) for Windows 10

July 25, 2017

RECEIVED  
JUL 28 2017

EPA Region 2 Director Gary Klawinski  
U.S. EPA - Region 2  
187 Wolf Road, Suite 303  
Albany, NY 12005

I am a former resident of Carmel, NY and current resident of New Paltz NY. I have lived in the Hudson River Valley for 17 years. I have kayaked many miles on the Hudson River with my family and my Girl Scouts. EPA, you should reconsider your data regarding the current state of the <sup>Hudson</sup> river and the PCB levels. Please reconsider your 2nd 5yr Review of the Superfund project. This report must plainly state the cleanup is NOT PROTECTIVE and you should eliminate the claim that the clean up WILL BE PROTECTIVE. I am very concerned about the levels of PCBs in the water of the fish that live in the water. The cleanup that GE did was not sufficient to fully remove these PCBs. The Hudson River, being a tidal river will be affected <sup>by</sup> this for years to come. Achieving these goals of a cleaner, healthier river depends on the change in your Five-Year Review to "is not protective". I strongly urge the EPA to heed these concerns and make these changes.

Sincerely,

Barbara D. Bender



B. London

#



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25 JUL '17  
PM 2 L



EPA Region 2 Director Gary Klawinski  
U.S. EPA – Region 2  
187 Wolf Road, Suite 303  
Albany 12005

12005-116870





July 25, 2017

EPA Region 2 Director Gary Klawinski  
U.S. EPA - Region 2  
187 Wolf Road, Suite 303  
Albany, NY 12005

RECEIVED  
JUL 28 2017

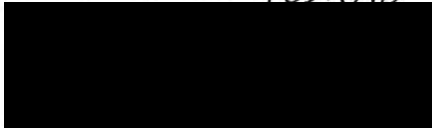
Although I don't live in NY state, as a young adult I am concerned with all environmental problems that are being created now (and in the past) for the next generation. The fact that the EPA has failed to hold GE accountable for the full extent of its contamination in the Hudson River is unacceptable and can only be explained by corruption of an agency that needs to be ~~as~~ responsive to the people, not big corporations. Please Reconsider the conclusion of your Second Draft Five-Year Review of the Hudson River Superfund project. Your final report must plainly state the cleanup is "not protective". Your final report should eliminate the unsubstantiated claim that the cleanup "will be protective". The final report should call for a remedial investigation for the lower Hudson.

DO YOUR JOB!

Sincerely,

Sasha Langesfeld

Sasha Langesfeld



NOV 14 2011  
ALBANY NY



EPA Region 2 Director Gary Klawinski  
U.S. EPA – Region 2  
187 Wolf Road, Suite 303  
Albany 12005

12005-140070



# EPA Second Draft Year Review

Julie Lappano [REDACTED]

Mon 8/28/2017 4:10 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

My name is Julie Lappano, and I am a lifelong resident of New York State and a 6 year resident of Upper Manhattan. For my entire life the cleanliness of the Hudson river has been the butt end of jokes, known as hopelessly polluted from an era of unregulated industry. It appears that the freedom for industries to poison our public water is gaining ground once again.

An original cleanup plan for the Hudson should have shown us a decreased level of PCBs in the water around my home. It did not, therefore any reporting of the project should be labelled as "not protective". Residents have the right to enjoy clean water from the Hudson, and GE is responsible for cleaning the literal mess they made of it.

Sincerely,

Julie Lappano  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Michael Laser [REDACTED]

Wed 8/23/2017 2:50 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I live a few miles from the Hudson River and spend a lot of time along the riverfront. Today I saw an article in the Poughkeepsie Journal that surprised me. I'd thought the river was much cleaner recently than in the past, but apparently it's still not safe to eat fish from the river.

I'm pasting below the key parts of the article. I trust these people, and hope you will listen to them.

"The EPA's own five-year review found that GE's cleanup is not currently protecting the health of the public or the environment. That should be the sole conclusion of its report. The EPA should remove statements from its review forecasting that the cleanup "will be protective" in five decades or more — verifying this prediction, the agency admits, will require eight additional years of research. Furthermore, analyses by scientists from other federal and state agencies indicate it will take a century or longer for nature to remove these poisons. A finding of "not protective" would open the door to additional dredging, putting the Hudson on a quicker path to recovery.

These experts insist more upriver dredging is needed now because two to four times more PCBs remain in the cleanup area than the EPA expected and projections show that fish recovery targets will be missed by decades. Physically removing these chemicals is the only way to ensure a quicker cleanup. To date — as the EPA's review makes clear — PCB levels in the 160-mile portion of the Lower Hudson have not benefited much, if at all, from upriver dredging. In actuality, contamination in fish at Poughkeepsie remains as high as it was before the dredging project. You should also tell the EPA to order GE to conduct an investigation to figure out how to clean up the lower Hudson.

As long as it remains in the river, this pollution will compromise the Hudson's economic, recreational, cultural and scenic values. These toxins have destroyed a once-vibrant commercial fishing industry, hampered the operation of marinas, curtailed marine transport on the Champlain Canal, tripled dredging costs in the NY-NJ Harbor, prevented ambitious economic development opportunities all along the river, and barred residents and visitors from full enjoyment of it for nearly 80 years. Worst of all, for low-income and minority families who subsist on the river's tainted fish, they pose a significant health threat."

Thank you for your attention.

Sincerely,

Michael Laser  
[REDACTED]  
[REDACTED]  
[REDACTED]

# Protect people and wildlife, not GE

Judy Lass [REDACTED]

Tue 8/29/2017 10:11 AM

To: Gary Klawinski, Project Director, EPA <epahrfo@outlook.com>;

Aug 29, 2017

Mr. Gary Klawinski, Project Director, EPA  
US EPA Hudson River Field Office, Region 2, 187 Wolf Road, Suite 303  
Albany, NY 12205

Dear Mr. Klawinski, Project Director, EPA,

To the members of the EPA

My family lives on the Hudson River. We are concerned that the cleanup is not proceeding as intended. There is still grave concern about the PCP's that were dumped by GE in the past which are not protective of humans nor the environment. The EPA must clearly state that the issue is not performing as planned and continue to do more dredging and cleanup in order to fulfill their commitment.

Thank you for the opportunity to submit my comments.

Sincerely,  
Judy Lass

Sincerely,

Miss Judy Lass

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

J. Eva Lau [REDACTED]

Fri 9/1/2017 2:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am a resident of Wilton, NY in Saratoga County. As a scientist with an advanced degree in physics, it is natural to expect that policy decisions be made using data. As a citizen, I expect government funded agencies to protect public interests (including human and environmental health). A healthy environment helps to ensure that natural resources continue to be available in the future and for the benefit of the entire community. We must act for long term, not only short term goals.

Many people have enjoyed the Hudson River for recreation and many businesses along the shores have thrived because of the proximity to the river. However, data has shown that current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. According to the studies, the only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable time frames as agreed upon in the Record of Decision. I urge the EPA to also follow the agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

There is only one planet. If the government won't do its part to protect its citizens and resources, who will?

Again, please call for further study and appropriate follow-up action.

Sincerely,

J. Eva Lau  
[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Robin Laurita [REDACTED]

Mon 8/21/2017 11:20 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

My name is Robin F. Laurita, and I am a proud resident of our majestic Hudson Valley. I am writing to you today to insist that the Hudson River, the heart of the Hudson Valley, be finally cleaned up to its previous state, before General Electric poisoned it. This action is not just necessary, it is imperative. I thank you in advance for your time and attention to our need, and I look forward to hearing from you in regard to your support of this request.

Most gratefully yours,  
Robin F. Laurita

Sincerely,

RFL

[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Margaret Leather [REDACTED]

Fri 9/1/2017 2:30 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I have lived in Monroe, NY, in the beautiful Hudson Valley with my family for 22 years. We are proud homeowners and we remain in awe of our gorgeous Hudson River. We are very saddened by the EPA's decision to accept the inadequate clean-up of PCBs by GE. This remedy does *\*not\** protect us! We are not satisfied to wait until our great-great grandchildren are born to be able to safely eat fish from the Hudson River. The EPA must remove the phrase that "the remedy will be protective" because it is not true! We need further dredging to remediate this terrible situation and we demand an investigation of contamination in the lower Hudson. Anything less than that is a disservice and an injustice to all the residents of this area. Many of us enjoy the Hudson on a daily basis and it is a travesty for the EPA to accept this clean-up as a done deal. We are far from done!

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Margaret Leather  
[REDACTED]  
[REDACTED]  
[REDACTED]



# Hudson River Clean Up

Patti Lenseth [REDACTED]

Wed 8/2/2017 12:48 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Cc: info@riverkeeper.org <info@riverkeeper.org>;

Importance: High

A Healthy Hudson River is of great importance to me and to New Yorkers, both upstaters and downstaters. It connects us. We love the beauty of it and supplies drinking water to many of its communities. At one time we could eat the fish and enjoy a swim. I think the goal should be to get it back to that point.

To abandon the cleanup of PCB's would be a great tragedy. The cleanup must continue and the corporations such as GE should be made to pay for and monitor the cleanup. It is the least they can do after all the damage they have done. This project must be continued until the levels in the upper and lower areas are below levels harmful to humans, fish and wildlife. *Water Is Life.*

Patti Lenseth  
[REDACTED]

# EPA Second Draft Year Review

Jean Leo [REDACTED]

Fri 9/1/2017 2:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am a resident of Valley Cottage, who loves the Hudson River enormously. Would that I could afford the taxes to live right on its banks! My husband & I walk the path at Nyack Beach & spend time in Memorial Park in Nyack, watching the fishermen and boaters and all that is spectacular about the river in our area. Further down, we also spend time near the river in NYC.

We are retired now, but at one time, I worked with a Columbia graduate student (also a fisherman) who spent many years researching the PCB situation in the river, fighting for the legislation needed to stop GE from dumping, and in fact wrote his doctoral dissertation on the post-GE chemistry of the river full of PCBs. After his efforts and those of others, some good things started to happen re: clean-up, though not nearly enough. More cleanup is desperately needed. What now?? To reverse the (too-)slow progress already made & let GE Off the hook for the toxic situation they visited on this beautiful river would be unspeakable.

The remedy in the EPA report is not protective; the EPA should remove that statement from the report. The report must ask for more dredging in the upper Hudson, and call for an investigation of contamination in the lower Hudson. Current politics says that cleanup will be an uphill effort. Nothing worthy to be done is ever easy. Somewhere down the line, and soon, someone needs to say "the buck stops here" and do the right thing.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Jean M. Leo  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

I live in Manhattan and am an avid  
paddle boarder. The Hudson River is an  
amazing resource for paddle sports and it  
is unacceptable for this resource to  
remain contaminated with toxic PCB's.  
Clean-up the Hudson Now

Sincerely,

Name:

Scott L. L.

Address:

E-mail:



**SCENIC  
HUDSON**



**RIVERKEEPER**  
— NY's clean water advocate

[scenichudson.org/pcbs](http://scenichudson.org/pcbs) [riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)

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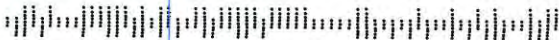
SEP 2017 PM 15 L



# #HealthyHudson

**RECEIVED**  
SEP 06 2017

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# EPA Second Draft Year Review

David Limburg [REDACTED]

Mon 8/21/2017 4:50 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I live in Cold Spring on the Hudson. In my area, it's not considered wise to swim in the river, and certainly not to eat the fish from here. Yes, the river is cleaner than it was in the 1970s, but it's still not up to par.

Industrial pollutants from upstream still contaminate the water, the soil beneath it and surrounding it, and the fish and plantlife in it.

The lower Hudson River saw little benefit or impact from the dredging project; the contamination remaining in the river is significantly higher than expected. The only appropriate conclusion for these conditions is "not protective."

Please continue dredging and continue studying the contamination levels in fish, plants, soil and water. I urge the EPA to follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

David Limburg

[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Hedvig Lockwood [REDACTED]

Mon 8/21/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am a resident of Hudson, NY. whose Dutch ancestors settled this region in the 17th Century. As a professional artist, I am aware of the importance of the Hudson River to the development of an art that was and is truly American.

The Hudson remains today, not only the heart of an important economic zone where millions live, work, and recreate, but an icon of American history familiar to the whole world. It's pollution by commercial enterprises is an outrage that still demands remediation.

The Hudson River Superfund cleanup has not done the job it was meant to do—secure the health of the river, its wildlife and the people living along it.

EPA must remove from its Five Year Technical Review report the phrase "the remedy will be protective" because the remedy is not protective: PCB contamination in the river remains a significant threat to public health and prosperity—as it has for nearly 80 years.

After six years of dredging, a cleaner, safer Hudson is within reach—but now EPA has allowed GE to dismantle its on-river operation, abandoning the remaining toxic river sediments that federal, state and local agencies warn could set back economic and environmental recovery for decades.

It is simply and obviously not good enough that in 50 years, people will be able to eat one fish from the Hudson per week and not get sick.

Sincerely,

Hedvig Lockwood  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Elizabeth LoGiudice [REDACTED]

Mon 8/21/2017 3:30 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am a lifelong resident of the Hudson River Valley, and an environmental educator who has been teaching adults and students about river ecology and watershed protection for nearly 20 years. The health and vitality of the Hudson River is key to the well-being of all residents, both human and wild. I am very concerned about the remediation of PCB's from the Hudson and I agree with scientists who have determined that efforts to remove PCB's have been insufficient.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies. For the sake of our communities and future generations, I urge that the review call for additional dredging of PCB's in the upper Hudson, and an investigation of contamination in the lower Hudson. The EPA should remove the phrase "the remedy will be protective" and should state that the remedy is not protective and further remediation and testing is necessary.

Sincerely,

Elizabeth LoGiudice  
[REDACTED]  
[REDACTED]  
[REDACTED]

# Wake up! More dredging is needed for the Hudson

Skyler Long [REDACTED]

Mon 8/21/2017 12:04 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

The Hudson River is a part of my back yard view. [I wake up and look out at it every morning.](#) The river is not only a vital part of Hudson valley's ecosystem, the scenery provides an attraction where local business want to invest in and revitalize the economy. No where in the Hudson Valley demonstrates this more than Newburgh. Newburgh has been plagued with violence and unemployment. Over the last couple years the situation is finally starting to improve. We can thank our local business and real estate investors who have recognized that Newburgh is a gem of a city on the Hudson. So why not put all the resources available to keep our river clean? You don't have to be an expert to know that is what is best for our environment and our economy.

Sincerely,

Skyler Long

[REDACTED]  
[REDACTED]  
[REDACTED]



# Protect people and wildlife, not GE

Albert and Doris Lowenfels [REDACTED]

Tue 8/29/2017 11:12 AM

To: Gary Klawinski, Project Director, EPA <epahrfo@outlook.com>;

Aug 29, 2017

Mr. Gary Klawinski, Project Director, EPA  
US EPA Hudson River Field Office, Region 2, 187 Wolf Road, Suite 303  
Albany, NY 12205

Dear Mr. Klawinski, Project Director, EPA,

Please help us preserve our natural endowment which is one of the main reasons America is GREAT. The Hudson defines our region and although much has been done to clean it up, more work is still needed. If the significant amount of contamination left in the river threatens both the public health and the environment, then the EPA should revise its determination and recognize that the current state of the cleanup is not protective of human health and the environment. The public needs an accurate report of how much PCB contamination is still in the River. We need to know if eating fish from the River is dangerous.

I urge EPA to require GE to do a full remedial investigation and feasibility study of the Lower Hudson River. And then, if indicated, GE should be required to take more PCBs out of the Upper Hudson River, and to help devise a cleanup for the Lower Hudson River.

Keeping America Great is hard work. Let's do it. Thank you.

Sincerely,

Dr. Albert and Doris Lowenfels  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Barbara Lubell [REDACTED]

Mon 8/21/2017 11:52 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Finish the job - Please!

Sincerely,

Barbara Lubell

[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

David Macaluso [REDACTED]

Fri 8/25/2017 1:47 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I'm born and raised in Westchester County, and my wife and I are raising our daughters here too. I remember how bad the river was when I was a child, and it has improved, but the job is not done! GE must've held responsible to finish the job & clean up our river!

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

David Macaluso  
[REDACTED]  
[REDACTED]  
[REDACTED]

# FW: GE & PCB Cleanup

Klawinski, Gary J <Klawinski.Gary@epa.gov>

Wed 9/6/2017 9:54 AM

To: 'epahrfo@outlook.com' <epahrfo@outlook.com>;

📎 1 attachments (4 MB)

GE\_activist.jpg;

---

**From:** Andrew MacInnes [REDACTED]  
**Sent:** Thursday, August 31, 2017 6:04 AM  
**To:** Klawinski, Gary J <Klawinski.Gary@epa.gov>  
**Cc:** Andrew MacInnes [REDACTED]  
**Subject:** GE & PCB Cleanup

Dear Mr. Klawinski:

As a longtime sailor who loves New York Harbor, the Hudson River and Long Island Sound, I have the following comments on the U.S. Environmental Protection Agency's (EPA's) Proposed Second Five-Year Review Report for the Hudson River PCBs Superfund Site. EPA's determination that the cleanup "will be protective" of human health and the environment for the Upper Hudson River is not acceptable. The risk of consuming fish from New York waters is completely underappreciated by society that believes a fish-based diet is healthier than a meat-based one. The odds are stacked against the unwitting consumer because the fish *look* healthy the fishing industry, food production industry, and restaurants are quick to turn a blind eye to the reality.

Shareholder activists have recently forced a change in the leadership at General Electric (GE). While the previous CEO cleaned up GE's image with its "ecomagination" campaign, the company has failed to clean up the environmental damage it caused in both the Hudson River and Housatonic River. As GE embarks on a capital return program for shareholders, it is appropriate to finally hold the company accountable to society for the damage they have done. Dredging is just one option. Technological advances have created potential additional solutions to clean the rivers and surrounding waters of pollutants. GE has the resources to not only evaluate these options but the opportunity to exploit them for its own business. New leadership at GE comes from the company's healthcare business and likely will understand and believe in science instead of thumbing their nose at the EPA.

EPA's review must clearly state "the remedy is not protective." In the report you admit that General Electric's cleanup of toxic PCBs it dumped in the Hudson River does not currently protect the health of the public or the river. That should be the only finding of the report. And you must remove the phrase "the remedy will be protective." Such a statement conflicts with your agency's admissions that the cleanup is not protective now, that at least eight more years of data are needed to predict future trends with any confidence, that the short-term 5-year fish tissue goal will not be met, and that more investigation is needed in the lower 150 miles.

The Hudson River and Long Island Sound are both critical resources. Because GE dumped over a million pounds of toxic PCBs into Hudson and Housatonic Rivers for more than three decades, the Hudson River has become one of

the nation's largest Superfund sites. There is already evidence that the cleanup will fail to meet the goals for the Upper Hudson River. Therefore, I urge EPA to require GE to do a full remedial investigation and feasibility study of the Lower Hudson River.

Thank you for the opportunity to submit my comments.

Andrew MacInnes

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]



**1. Hudson River**  
*Hazardous waste site*  
*1947 - Present*



**2. Housatonic River**  
*Hazardous waste site*  
*1932 - Present*

**What's The Matter With GE?**

# More dredging is needed for the Hudson

Edward Mack [REDACTED]

Mon 8/21/2017 3:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

As a resident of Albany, NY for 70+ years, I urge the EPA to carry out its own goal in dredging PCBs from the Hudson River. The job is, even by your measurements, simply "NOT finished", the work done thus far is "not protective" of the lower Hudson. The response of your agency to the discovery of larger deposits of PCBs than was expected should not be to leave the job half done, but rather to FINISH IT. Give Hudson Valley residents a chance to take children (and for me, grandchildren) out on a Hudson as clean as it was in my youth. Please review and act on the analysis of both Federal and NY State agencies on the continuing danger to human health which mark the current state of the Hudson. Thank you for the chance to comment on this important environmental issue.

Sincerely,

Edward Mack  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Cathy Mackey [REDACTED]

Tue 8/22/2017 11:30 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am a lifelong resident of the rivertowns. PLEASE continue the progress made so far on the Hudson! The rivertowns are flourishing and the river is coming alive figuratively and literally. Tourism is important to this area!

INDIAN POINT WILL CLOSE SOON thank God. That will only add to the appeal and beauty of the river.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Cathy A Mackey  
[REDACTED]  
[REDACTED]  
[REDACTED]



# EPA Second Draft Year Review

Molly MacQueen [REDACTED]

Tue 8/29/2017 3:10 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am a lifelong resident of the Hudson Valley, and have sailed on, fished and swam, and loved the Hudson River all my life. While I will not eat fish from this great East Coast fishery, I see many people who do. For you to put the interests of GE before the public is wrong, and precedent I also in the worst way. This is not a "Job killing" activity. To allow an incomplete cleanup of the Hudson is Job killing, as there will be a clear and direct impact to economic development, continued loss of the Hudson River fishery (commercial fishermen have been out of work for DECADES) and an abrogation of your duty. Which is not to GE. It is to US, the people of the Hudson valley.

I know firsthand that current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Molly MacQueen  
[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Sarah MacWright [REDACTED]

Mon 8/21/2017 12:02 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am deeply concerned about the Hudson River, and my family and I urge the EPA to remove from the report the phrase "the remedy will be protective." I am a resident of Millbrook NY who believes our local identity is tied to the river and its health. We are relying on the EPA to support a plan for more dredging.

With gratitude,

Sincerely,

Sarah MacWright

[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Kevin Magee [REDACTED]

Mon 8/21/2017 4:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski

The current levels of contamination of the Hudson River is unacceptable and must be addressed. As a resident of Troy, NY I am at the rivers edge every day and every day I face the prospect of a once beautiful safe and clean river is not fishable, drinkable, or open to any contact whatsoever. It is a constant aggravation that GE used the Hudson as a dumping site, destroying it for all recreation including fishing. What right does GE have to destroy a great river which they never owned and which was should be shared with millions of New York State river front owners, families, sportsmen, sustenance fishers and environmental enthusiasts.

The original assessment of the level of PCB was too low and that downstate communities have seen no benefit from the PCB cleanup. GE polluted the river. GE should clean it up and bring it back to its original health. The EPA has not fulfilled its mandate from the people until it completes the job.

The Hudson river continues to be a health hazard and the largest superfund site in the country, threatening the health of the citizens and denying the lower Hudson communities of much needed revitalization.

More studies are needed to determine the current level of contamination in the lower Hudson and the impact of the contamination on the residents along the Hudson and the impact on the region through loss of tourism. The report should state that the remedy is not protective and the EPM must remove from the report the phrase, "The ready is protective." The EPA should then follow up with the legal requirements to compel GE to finish the clean-up.

I welcome you to contact me to verify the veracity of my intent to see the PCB cleanup reexamined, restructured, reinstated and followed through to completion, including additional studies, additional cleanups until the Hudson is free of PCB contaminants and once again becomes a resource for the residents of the State of New York.

Kevin Magee, [REDACTED]

Sincerely,

Kevin Magee  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

Follow the conclusions of the  
research. Obviously the job has  
not been completed. Waiting decades  
for a clean river is just doing nothing.  
Now is the time to continue dredging  
until the job is complete.

-rely,

Name:

Tom Mahoney

Address

E-mail:



**SCENIC  
HUDSON**

[scenichudson.org/pcbs](http://scenichudson.org/pcbs) [riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)



**RIVERKEEPER**

NY's clean water advocate

ALBANY NY 12205

30 AUG 2017 PM 2:1



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**#HealthyHudson**

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SEP 9 6 2017

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



Dear Director Klawinski,

We need an honest evaluation of  
the data on PCB's. Priority must be to  
clean up the Hudson River ASAP.  
Waiting 50-70 yrs is unacceptable.  
If more dredging needs to be done EPA  
should get it done. Honestly look at facts

Sincerely,

Name:

Tom Mahoney

Address

E-mail



**SCENIC  
HUDSON**

[scenichudson.org/pcbs](http://scenichudson.org/pcbs) [riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)

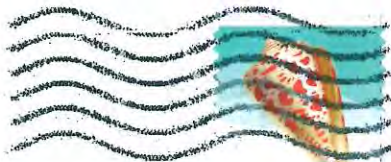


**RIVERKEEPER**

NY's clean water advocate

ALBANY NY 120

30 AUG 2017 PM 2 1

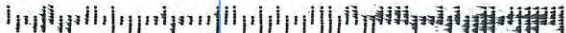


POSTCARD USA

**#HealthyHudson**

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SEP 06 2017

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# FW: Hudson River PCB cleanup not finished

Klawinski, Gary J <Klawinski.Gary@epa.gov>

Tue 8/15/2017 2:59 PM

To: Public Comment Hudson 2nd FYR (epahrfo@outlook.com) <epahrfo@outlook.com>;

Cc: Romanowski, Larisa <Romanowski.Larisa@epa.gov>;

---

**From:** barry maisel [REDACTED]  
**Sent:** Monday, July 17, 2017 9:33 AM  
**To:** Pruitt, Scott <Pruitt.Scott@epa.gov>; info@riverkeeper.org; Klawinski, Gary J <Klawinski.Gary@epa.gov>  
**Subject:** Hudson River PCB cleanup not finished

PCB cleanup of the Hudson River by GE is NOT protective & more work is needed to achieve a healthy Hudson River system.

Below the Troy Dam to NYC-- PCB levels in fish have not declined as expected.

With more PCB's than anticipated additional dredging of the upper Hudson 40 miles is needed.

GE should investigate Lower 150 miles of the entire Hudson to ensure That PCB levels do not threaten human life.

The EPA must give more weight to State & Federal agency finding that challenge those of the EPA.

Thank You

Barry Maisel MD  
[REDACTED]



# More dredging is needed for the Hudson

PAMELA Malcolm [REDACTED]

Mon 8/21/2017 11:22 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

As a resident of Staatsburg, NY, I am very upset to learn that the EPA is prepared to indicate in its five year technical review that more and further dredging of the Hudson River, to clean up PCBs and pollutants from the river, caused by GE, is not absolutely necessary, because this additional clean up absolutely is necessary!

The report must state that the remedy is not protective. Nowhere in the report should it be stated that the remedy will be protective.

New Yorkers and all citizens deserve better than to have to settle for a disastrously polluted river that is not adequately protected by the governmental agency who has this mandate and funding.

Do the right thing! Please!

Sincerely,

Pam Malcolm

[REDACTED]  
[REDACTED]  
[REDACTED]

# Comment for 2017 Five Year Review Report

Lucy Manning [REDACTED]

Fri 7/21/2017 12:21 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Dear Mr. Klawinski,

Thank you for holding the public forums regarding the 2017 Five Year Review Report of the Hudson River PCBs Superfund Site. I attended the one held in Saratoga Springs a few nights ago.

I just returned to living in upstate New York after a 15 year absence. Since living in Virginia I stopped following the Hudson River issue and came to the meeting to learn where we are today. I must say that I am very disappointed in the progress.

I presume we all agree that this longstanding incident of GE discarding PCBs in the river for so many years is heart rending and that similar events must be prevented at all costs. I depend on the EPA to monitor potential activities and pray that your funding and priorities remain equally in this direction as it is in correcting problems.

But of immediate concern is our Hudson River. I don't accept the reason to abandon further dredging in the upper 40 mile hot spots is that it would only gain about 5-10 years. 1. Please insist that GE complete the dredging project and attempt to remove the nearly 30% left in the riverbed. 2. Also please insist that they use the latest technology in dredging, no matter the cost, to avoid the current issues of PCBs being spread to floodplains.

Our quality of life, not to mention the whole ecosystem, is so strongly affected by the health of our river. Please defend us and protect us as the title of your agency assures it will do.

Thank you,  
Lucy Manning  
[REDACTED]

Fw: No

Mickey Marcella [REDACTED]

Fri 6/9/2017 9:40 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Leave it alone, your re-suspension is probably one of the biggest problems. I live in Stillwater and saw the dredging, what a mess, water and silt flowing out of every pass with the bucket. Media just oozing over the sides of the barges. What a joke, a colossal, multi-billion dollar joke.

Sent via the Samsung GALAXY S@4, an AT&T 4G LTE smartphone

Mickey

# Protect people and wildlife, not GE

Jeffrey Marino [REDACTED]

Thu 8/31/2017 9:16 PM

To: Gary Klawinski, Project Director, EPA <epahrfo@outlook.com>;

Aug 31, 2017

Mr. Gary Klawinski, Project Director, EPA  
US EPA Hudson River Field Office, Region 2, 187 Wolf Road, Suite 303  
Albany, NY 12205

Dear Mr. Klawinski, Project Director, EPA,

The PCB cleanup is not protective of human health and the environment because it is not performing as planned. You must order more dredging in the Upper Hudson River, and we need a remedial investigation/feasibility study in the Lower Hudson River as soon as possible.

Sincerely,

Mr. Jeffrey Marino

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Jeffrey Marino [REDACTED]

Fri 9/1/2017 2:30 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

The PCB cleanup is not protective of human health and the environment because it is not performing as planned. You must order more dredging in the Upper Hudson River, and we need a remedial investigation/feasibility study in the Lower Hudson River as soon as possible.

Sincerely,

Jeffrey Marino

[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Kate Marriott [REDACTED]

Mon 8/21/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am a resident of Dutchess County and attend school in Ulster County. The measures taken do not adequately reverse the affects of PCB pollution in the Hudson River and bear no burden of responsibility on the part of the corporate parties largely to blame. More dredging is needed and should not be ceased until the river is clean. Some part of this should continue to be provided by private parties that bear liability.

Sincerely,

Kate Marriott  
[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Daniel Marshall, III [REDACTED]

Mon 8/21/2017 11:30 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I moved here from Texas in part because of the beauty of the Hudson. My family and I plan on living here for generations to come and we intend to vote based on our belief that the environment is worth protecting. GE reaped the benefits of the Hudson River and acted irresponsibly and must be held accountable for the damage it has caused and continues to cause. We are seeing more of the nature come to life since the cleaning has begun, please don't stop now. The historical importance of this area deserves protection and enforcement from the people's regulatory agency. We will remember those in charge and hold his or her political careers in the balance if the people of the Hudson River are ignored once again for big business. Please don't turn New York into a polluted and earthquake ridden area like the former governor of Oklahoma, and now head of the EPA, did to his state. The ruling that GE must cleanup their damage must be upheld. I cannot stress the vital importance of our beloved Hudson River. We will take this fight personally and we will see justice done.

Sincerely,

Daniel Marshall  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

I am a resident of the Hudson Valley & am a rower on  
a crew team that rows on the Hudson. It is important  
to me, our community, Dutchess County & New York  
State that the Hudson River be cleaned of PCB's  
properly & immediately! Our economy & our way  
of life depends on the clean up being done properly.

I urge you to take action immediately to help the thousands of  
Sincerely, residents in New York.

Name: Matthew A. Martin

Address:

E-mail





scenichudson.org/pcbs



# #HealthyHudson

RECEIVED  
SEP 01 2017



UNITED STATES POSTAGE  
02 1P \$ 000.34  
0003173553 AUG 29 2017  
MAILED FROM ZIP CODE 12601

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



Dear Director Klawinski,

GE needs to finish the job  
of cleaning up their  
mess.

Hold them to it!

Sincerely,

KARA MASCIANGELO

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Email: \_\_\_\_\_



**SCENIC HUDSON**

scenichudson.org/pcbs riverkeeper.org/pcbs



NEW YORK NY 100

20 AUG 2017 PM 13 L



# #HealthyHudson

The current state  
is not  
protective!

GE needs to finish  
cleaning up their mess or people will die.

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

**RECEIVED**  
AUG 28 2017

Dear Director Klawinski,

My nephew and I are downstate  
paddlers on the Hudson. He  
is 9 and was taught that  
we all have to clean up after  
ourselves. Why does GE get  
away with it? Clean up the  
PCBS!

Sincerely,

Name:

Xara Masciangelo

Address

E-mail:

@



**SCENIC HUDSON**

[scenichudson.org/pcbs](http://scenichudson.org/pcbs) [riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)



**RIVERKEEPER**

NY's clean water advocate

NEW YORK NY 100

22 AUG 2017 PM 14 L



BRONZE AGE • FOREVER/USA

# #HealthyHudson

Clean it  
up!  
GE!

Gary Klawinski

Director, Hudson River Field Office

U.S. Environmental Protection Agency

187 Wolf Road, Suite 303

Albany, NY 12205

**RECEIVED**  
AUG 28 2017



Dear Director Klawinski,

Please finish the job  
of cleaning up the PCBs  
from our mighty  
Hudson. There is a lot  
more work to do! ASAP.

Sincerely,

Name:

KARA MASCANGELO

Address:

E-mail:

@



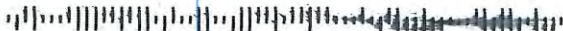
scenichudson.org/pcbs riverkeeper.org/pcbs



# #HealthyHudson

RECEIVED  
SEP 01 2017

.2205-113878



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

Dear Director Klawinski,

I PADDLE OUT OF PIER 84 AND

I LOVE SEEING ALL THE IMPROVEMENTS ON THE WATERFRONT.

WE NEED TO KEEP THE HUDSON IN GREAT SHAPE FOR GENERATIONS TO COME. THE CURRENT PLAN IS

NOT PROTECTIVE. GE MUST FINISH

Sincerely,

Name:

KARA MASCIANELLO

Address:

E-mail

THE JOB

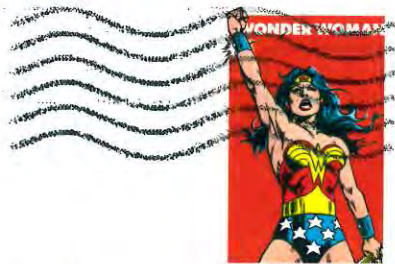
OF CLEARING THE PCBs.





NEW YORK NY 120

20 AUG 2017 PM 12 L



BRONZE AGE • FOREVER/USA

scenic Hudson.org/pcbs riverkeeper.org/pcbs

# #HealthyHudson

WE MUST FINISH  
CLEARING OUT  
THE PCBs, THE  
CURRENT PLAN IS  
NOT PROTECTIVE!

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

RECEIVED  
SEP 01 2017

# Hudson River

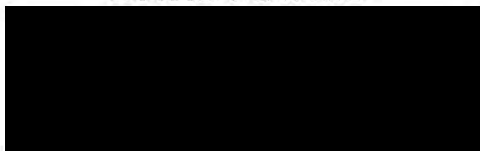
janice mastromarchi [REDACTED]

Thu 8/31/2017 11:10 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

to the EPA, Please declare the cleanup of the Hudson River of PCB's as not protective and needing of further study to ensure the health and well being of people on its shores. Yours truly Janice Mastromarchi [REDACTED]

DAVID MATHIS



RECEIVED  
AUG 28 2017

Gary Klawinski  
Hudson River Field Office  
187 Wolf Road, Suite 303  
Albany, NY 12205

24 August 2017

re: five year review - comments

Dear Mr. Klawinski,

I'm not sure if sending this letter to you is the proper avenue to get my comment to the five year review. If it is not, please notify me of the proper method.

Rather than list each question then posting a specific answer with statistical comparisons, I will provide general answers based on my observations primarily in the Schuylerville area based on my lifetime residency near the river and my many years of recreating on it.

It was interesting to learn that if the sediment still had high levels of PCBs after two dredging passes the area was capped rather than making a third pass. Even though much more PCB contaminated sediment was found than anticipated, the ROD was not modified to order additional cleanup. GE was allowed to leave contamination in place. How can you apply any logic and see this as anything other than a failure of our government to protect its people and a great victory for the GE legal staff.

The stated objective, or so I've been told, of protecting people is a failure in my opinion. The dredging in the deep areas to remove the contaminants has limited success but where do most of the direct exposures to people and wildlife occur? They occur in the muddy shallow areas where people wade while going to or from deeper water to swim, they wade there while fishing, and our children wade there to cool off during the hot summer months. These shallow areas seem to have been intentionally skipped. Mr. Klawinski, as I stated in a previous letter of which you were copied, the sediment near my dock was tested by NYSDOH and found to be 63ppm. Within a short time GE retested the area and found it to be only 49.9ppm so it was not 50 ppm or greater making it a hazardous waste. The floodplain had been capped but the contaminated sediment (water depth 0 - to about 4') has not been removed. Also, the shallows from the upper river side of mouth of the Battenkill and north and south for about 100 yards have been commonly used each fall by waterfowl hunters. This is a known dumping area for dredge spoil so one would reasonably suspect a significant level of contamination to be present. While observing the dredge operation, I could see no material being removed from the shallows in this area.

The review asked about effectiveness of the remedial action. Is it possible that some of the re-suspended contaminants may have settled onto these shallows and increased the hazards to the people? Have the shallow areas been tested for any change in contaminant levels? If not, how do you know if the dredging has reduced the contaminants and risk to people or if the project actually made exposures to the mud in the shallows more hazardous?

Several of the backfilled areas have been grossly overfilled. A trip along the river while the water is at the normal summer levels will reveal numerous areas with backfill above the water level creating small islands. In an area locally known as "The Cove" which is about three miles south of Schuylerville, the water in many areas was about 2' deep then soft silty mud extended as deep as one could push an oar. The Cove was dredged to 6'-10' depth (depending on which local person measured it) which removed the weeds, primarily invasive water chestnuts, and opened the area for fishing and other recreation. GE was applauded for this until the backfilling started. So much gravel was dumped into the cove that the filled areas now present a hazard to recreational navigation and several boats have been grounded onto the fill. An owner of property bordering the Cove stated that he intended to reopen the marina located there which closed in the early 70s. Those plans have been abandoned due to the lack of depth. This marina could have employed one or two people full time along with several seasonal employees. Another area grossly over backfilled is immediately north of the old Schuylerville Junction Lock. The area was muddy but fishing boats commonly plied the area. The former owner of the now abandoned oil terminal bordering this area indicated a desire to open a marina at the site if he could get another foot of depth. After the mud was removed, the backfill reduced the depth to the original or less. Another potential business has been rendered unfeasible.

The old Champlain Canal which runs through Schuylerville was not remediated although Hudson River/Champlain Canal water feeds it. It frequently overflows into an area used by children for recreation.

In my opinion, the dredge project has not improved our community, the protection of the people, or the economic potential of the area. The project has left contaminated sediments in the depths where they may or may not remain for centuries and in the shallows where people can unknowingly contact the toxic materials through innocent regular use of the river. The project needs much more work before it can be considered a success.



cc:

Governor Andrew Cuomo

Lindley Kratovil, Chief of Staff for Congresswoman Elise Stefanik

Scenic Hudson

Riverkeeper

David Mathis



ALBANY NY 12205  
24 AUG 2017 PM 5:1



Gary Klawinski  
Hudson River Field Office  
187 Wolf Road, Suite 303  
Albany, NY 12205

12205-119878



DEBRA MATHIS

RECEIVED  
SEP 01 2017

Gary Klawinski  
Hudson River Field Office  
187 Wolf Road, Suite 303  
Albany, NY 12205

29 August 2017

re: five year review - comments

Dear Mr. Klawinski,

Now that the dredge phase seems to have ended, even though much more contaminated sediment remains, and we move to the floodplain phase, I welcome the opportunity to provide comments to the EPA for the five year review.

As to the question of the protection provided by the dredging phase, my answer is a strong "No, the EPA has failed to protect us" for the following reasons:

The water flowing into the old Champlain Canal which runs through Schuylerville has been continually fed by the same water that brought the PCBs several miles from the north and deposited levels high enough to requiring dredging immediately upstream of the feed source of the canal. The sediment in the canal needs to be removed down to the original depth of seven feet and left there with and no backfill put into this historic waterway.

Dredging the parts of the river was a good start but the shallows were missed in many areas. These areas are where the exposure to our children and our wildlife occurs. As I understand, the floodplain project will extend only to the edge of the water, not into the shallows so these contaminated areas will be left for future generations. Just in our local area I am familiar with several areas where our young people go to swim that have not been cleaned. It's logical to assume that many more contaminated shallow areas exist along the river where people go to swim. The contaminants need to be removed from these areas but it seems that EPA has provided no avenue to remove this hazard and allow safe access to our beautiful Hudson River.. Rather than list all of the areas in this letter, please feel free to contact me to discuss the location of the areas.

My government has allowed this waterway to be poisoned. Now it's time to undo the harm and give us a river that's safe for our neighbors and our children.

cc:NYSDEC Commissioner Basil Seggos

Debra Mathis

# More dredging is needed for the Hudson

Anne McCabe [REDACTED]

Mon 8/21/2017 11:33 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I, Anne McCabe, and my husband Bill live in Union Vale. We have seen the Rhine and Rhone as well as the Thames River, but the Hudson has even more natural beauty than they. The aquatic life in the Hudson and the species that rely on its waters along the Hudson deserve as do we, the human population, a clean river the integrity of which will be guaranteed for our children's children for centuries to come. My husband Bill and I came from other river systems to this one, I from Long Island and my husband from northern Jersey. We have seen pollutants change what we knew of as clean water and abundant fish and aquatic life. Bill and I had four children who among them have nine children. We are stake holders in the future.

The EPA must do a better job of dealing with the contamination of the Hudson. The EPA report about the dredging of the Hudson must state the remedy is not protective. The EPA must remove the phrase "the remedy will be protective." Since it was found that in fact there was 3 to 5 times more pollution in the Upper Hudson than had at first been believed and yet there was no expansion of the cleanup, the pollutant level is still dangerously high.

Those who live and work in and along the river face grievous health issues. The very least you can do now is to study the implications of this downriver contamination and put into place a plan which includes a five year continuing review of the contamination of the river. We who live in the lower regions of the river as well as those in the upper regions want to live in an environment as free from these contaminants as possible. That has not yet happened. The EPA must work to ensure an ongoing analysis and cleanup.

Sincerely,

Anne M. McCabe

[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Christa McCauley [REDACTED]

Mon 8/21/2017 3:30 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am a new resident of Germantown, having moved here from Easthampton, MA where I worked for and am a member of the CT River Watershed Council.

I moved to the Hudson River Valley to be near my family, especially two baby grandchildren. We all enjoy outdoor activities, especially around and on the Hudson. This is why I am concerned about the continued pollution and dangerously higher than predicted levels of PCBs in the river.

It is within our power to make this river safe for my precious grandchildren now and in the future. We need you to protect our nation's resources and live up to the promise of the EPA.

We need you use best scientific practices. Contamination threatens our river, our water supply and our future. It is absolutely vital that you finish what you started! We need to clean up the Hudson River with all the best research data available without further delay.

Sincerely,

Christa McCauley  
[REDACTED]  
[REDACTED]  
[REDACTED]



# EPA Second Draft Year Review

Nora McDowell [REDACTED]

Fri 9/1/2017 2:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am a mom that is raising her kids along the Hudson River in Downtown Troy NY. We are a hot city and we have no public swimming pools. The Hudson River calls to us as a resource to beat the heat, yet it is still polluted by PCBS and dangerous to our youth and families.

We are not protected..  
EPA must remove from the report the phrase "the remedy will be protective."

The report must call for additional dredging of PCBs in the upper Hudson.

The report must call for an investigation of contamination in the lower Hudson.

I hope that in the future we Troy Dam neighborhood people can safely recreate and enjoy the Hudson River.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

At the Ingalls Ave boat launch area I see the people that are fishing in Troy NY in the summer of 2017. I worry that they do not know the Eat None advise for women and children. I am also sad that our poor people can not safely eat the fish from the Hudson River.

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Help the RiverPeople.  
Peace,  
Nora McDowell

Sincerely,

[REDACTED]  
[REDACTED]



RECEIVED  
JUN 14 2017

12 JUNE 2017.

EPA REGION

1 HUDSON RIVER OFFICE  
187 WOLF ROAD - SUITE #303  
ALBANY, NY.

ATTENTION:

GARY KLAWINSKI

SIR:

THE CONDITION OF THE HUDSON RIVER HAS IMPROVED IMMENSELY SINCE THE CLEANING STARTED.

THE FACT THAT THE PUBLIC HAS CO-OPERATED WITH THE CLEAN-UP BY CREATING GOOD WASTE HANDLING AND BUILDING SEWER LINES HAS DONE AWAY WITH MUCH OF THE NASTY ODOR, THE BAD COLOR AND THE SEWAGE IN THE WATER.

ALONG THE RIVER WE ALREADY SEE THE RETURN OF SOME SHORE BIRDS AND THE WATER HAS CLEARED.

THE STATE WOULD SHOW VERY POOR JUDGEMENT IF THE

(2)

WORK WERE STOPPED. THERE IS STILL MUCH TO DO TO CLEAN THE CHANNEL AND HELP CLEAR OUT THE HIGH WATER IN FLOOD CONDITIONS.

MY FAMILY HAS LIVED ON THE BANK OF THE RIVER IN RENSSELAER COUNTY SINCE 1947. AND IN THE HUDSON VALLEY FOR GENERATIONS.

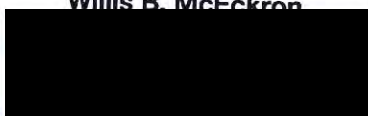
IF THE RIVER AND ITS TRIBUTARIES WERE AGAIN ALLOWED TO BE MIS-USED BY DUMPING AND TO BE SUBJECTED TO RUN OFF SILT AND POISONS, IT WOULD BE A TERRIBLE MISTAKE. WE MUST NOT ALLOW OUR STATE CONSERVATION DEPARTMENT TO AGAIN IGNORE THEIR RESPONSIBILITIES.

MAINTAINING CLEAN WATER, BOTH ABOVE AND BELOW GROUND, WILL DO WONDERS FOR NEEDED HEALTH CONDITIONS.

Sincerely,

Willis B. McEckron

Willis B. McEckron



PLEASE TRY TO ACCEPT THIS  
LETTER IN THE SHABBY CONDITION.  
I AM [REDACTED] YEARS OLD  
AND NO LONGER TYPING.

Bill McEckron

Willis B. Meckron

ALBANY NY 12201

12 NOV 2007 PM 5:1



MR. GARY KLASINSKI

EPA REGION

1 HUDSON RIVER OFFICE

187 WOLF ROAD SUITE #303

ALBANY NY 12205

12205-11397B



# EPA Second Draft Year Review

Susan McGrath [REDACTED]

Mon 8/21/2017 3:30 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Citizens and the wildlife will benefit from a clean Hudson River. Those who polluted it, have the responsibility to fully clean all of their contamination from our water.

Sincerely,

Susan McGrath

[REDACTED]  
[REDACTED]  
[REDACTED]

# Hudson River PCB cleanup

Ginny [REDACTED]

Mon 7/31/2017 11:52 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Sent from my iPad

Dear EPA,

From my window I can see herons and eagles along the Hudson near Schuylerville. I also see children swimming and tubing. I see people fishing.

Please continue to clean the PCBs from the Hudson. This beautiful river deserves to be clean and the people who use it deserve clean water.

Sincerely,

Virginia McGreevy



Dear Director Klawinski,

I am writing to you  
to convey my strongest conviction  
that S.E. must continue with the  
clean-up of the P.C. Co. that they polluted  
the Hudson well so many years ago. Their  
culpability must be upheld. *Grant McKown*

Sincerely,

Name: \_\_\_\_\_

GRANT MCKEOWN

Address: \_\_\_\_\_

E-mail: \_\_\_\_\_



**SCENIC HUDSON**

[scenichudson.org/pcbs](http://scenichudson.org/pcbs)



**RIVERKEEPER**

NY's clean water advocate

[riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)

NEW YORK NY 100

20 AUG 2017 PM 22 1

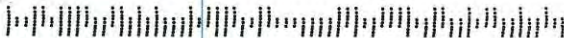


POSTAGE PAID

# #HealthyHudson

**RECEIVED**  
SEP 06 2017

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# EPA Second Draft Year Review

Merry McLoryd [REDACTED]

Fri 9/1/2017 2:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable time frames as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

The report must state the remedy is not protective.

EPA must remove from the report the phrase "the remedy will be protective."

The report must call for additional dredging of PCBs in the upper Hudson.

The report must call for an investigation of contamination in the lower Hudson

Sincerely,

Merry McLoryd  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

Dear Friends, Finish the job,  
Protect us please  
I own 2 buildings on the Hudson,  
in Mechanicville. I am severely  
disappointed that our Hudson is  
still only polluted with PCBs and  
sewage. Please Remediate! The clean  
up is not complete! Dredge more in  
upper Hudson. Thank you for your work.

Sincerely,

Name:

James McNellan James McNellan

Address:

E-mail:



# EPA Second Draft Year Review

W. Patrick McMullan [REDACTED]

Tue 8/29/2017 1:50 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

I have owned a home in the Hudson Valley (Milan) for 23 years. All the while I have looked forward to the time when I could swim, kayak and fish in the Hudson without pollution. GE has not finished job of removing the toxic PCBs it dumped into the river. Just because the scope of the damage is greater than earlier believed does not absolve them of remaining culpability. The should state clearly that the clean up of the river that was pledged is incomplete.

Sincerely,

Pat McMullan

Sincerely,

W. Patrick McMullan  
[REDACTED]  
[REDACTED]  
[REDACTED]

# GE clean up of the Hudson

Christopher McNally [REDACTED]

Thu 8/24/2017 9:31 AM

To: Gary Klawinski, Project Director, EPA <epahrfo@outlook.com>;

Aug 24, 2017

Mr. Gary Klawinski, Project Director, EPA  
US EPA Hudson River Field Office, Region 2, 187 Wolf Road, Suite 303  
Albany, NY 12205

Dear Mr. Klawinski, Project Director, EPA,

Dear EPA-

Please force GE to finish the job of cleaning PCB's from the Hudson River. GE spent years polluting the river and made a fortune while doing so. Now they can spend more years cleaning it up, and spend a fraction of their budget on the job. They had a good beginning, but to say they are done would be irresponsible. Please, as an agency in service of the public, not corporate interest, force GE to keep going.

Thank you,

Sincerely,

Mr. Christopher McNally

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

David McNally [REDACTED]

Mon 8/21/2017 3:41 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

our town borders the Hudson River and though we are thankful to live in an area where the river is clean, the entire river holds a special place in our lives.

This report must state that the proposed "remedy" is not protective. As such, the EPA should remove the phrase "the remedy will be protective" from the report. The report must call for additional dredging of PCBs in the Hudson River - get them out of there. The report must also call for an investigation of contamination in the lower Hudson River.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

David McNally  
[REDACTED]  
[REDACTED]  
[REDACTED]



# EPA Second Draft Year Review

Kathryn McNamara [REDACTED]

Tue 8/22/2017 9:50 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am [REDACTED] years old, and a life long resident of the Hudson Valley. Born in Kingston, and now a resident of Rensselaer County, I don't believe I have ever lived much more than 10 miles from the Hudson. I am truly grateful for the rehabilitation that has been hard-worn for this natural treasure, and much of this has been the result of a true community-agency collaboration.

But more work is needed, and we cannot take the foot off the gas now. We've come too far.

The current levels of contamination in fish, sediment and water are still too high, and not what the dredging project was expected to achieve. I know a lot went into it, but the conclusion of this project based on these conditions is "not protective."

While some PCBs will remain in the river, the current level is not safe or acceptable. The dredging project should be expanded, not wrapped up.

I ask that a comprehensive study of downriver contamination be made, with an eye towards a recommendation for more action.

Please follow guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Kathy McNamara

[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Mr. & Mrs. Francis Metelski [REDACTED]

Mon 8/21/2017 3:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I have been a resident of the town of esopus fire 33 years and before that Fishkill. I spend a lot of time near and on the river. We need to continue to Clean up this magnificent body of water that so many people enjoy so that many future generations can continue to do so. Please remove the phrase "the remedy will be protected" from your report. The remedy should not be protected. Let's finish what was started.

Sincerely,

Francis Metelski

[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Julie Metz [REDACTED]

Mon 8/21/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

My name is Julie Metz and I live and work in Hudson , NY. As a resident and property owner in Hudson, and as a citizen concerned about the safety and preservation of our river, I urge the EPA to make GE finish the dredging process it started. GE polluted the river, killing off fish and wildlife, and plants, turning a lifeline for centuries of people into a toxic waste site. They only began cleanup because of pressure from citizens and environmental groups and the EPA. However the job was left unfinished. The river still contains dangerous levels of PCBs. GE must finish the cleanup and return the river to a waterbody that can support edible fish, and recreational activities such as swimming. Any other decision permits this company to literally get away with murder.

Sincerely,  
Julie Metz

[REDACTED]

Sincerely,

Julie Metz

[REDACTED]

[REDACTED]

[REDACTED]

# More dredging is needed for the Hudson

Carol Meyer [REDACTED]

Mon 8/21/2017 12:05 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am a resident of Pleasant Valley, NY. I have been following the progress of the Hudson River dredging process since the process began. It took over 22 years for the state and federal government to begin the dredging process. Now, the EPA is renegeing on its agreement that the remedy must be protective. If the dredging doesn't get completed, there is no remedy for the health of those dwelling around the river, and the fish in it will remain inedible. Businesses that depended on the shad for their livelihood will fail. This is unconscionable. Why not complete the process? It has gone on too long to give up before getting tangible results!

Sincerely,

Carol S. Meyer  
[REDACTED]  
[REDACTED]  
[REDACTED]

# CORRECTED: Michaels and Oko comments on EPA Proposed Second Five-Year Review Report for Hudson River PCBs Superfund Site

Robert Michaels [REDACTED]

Wed 8/30/2017 2:21 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Cc: Ms. Larisa Romanowski <romanowski.larisa@epa.gov>;

Importance: High

📎 1 attachments (2 MB)

Michaels and Oko Comments on EPA Draft 2nd Five-Year Review.pdf;

Gary Klawinsky  
Director  
EPA Region 2 Hudson River Office  
187 Wolf Road, Suite 303  
Albany, NY 12205

Hi Gary,

I am pleased to attach to this e-mail comments of Dr. Uriel Oko and myself on EPA's *"Proposed Second Five-Year Review Report for Hudson River PCBs Superfund Site."* I hope that EPA will consider these comments in its forthcoming document responding to public comments, and also will consider them in the final version of EPA's *Second Five-Year Review Report for Hudson River PCBs Superfund Site."* Please acknowledge receipt by responding to this e-mail.

I hope you are having a great summer!

With thanks and best regards,

Bob

=====  
Dr. Robert A. Michaels; PhD, CEP

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

=====

**Negative Hudson River Superfund remediation effectiveness:  
clamshell dredging massively mobilized sediments,  
increasing PCB contamination**

**Comments on US EPA's Proposed Second Five-Year Review**

Robert A. Michaels<sup>1</sup>, PhD, CEP; and Uriel M. Oko<sup>2</sup>, PhD, PE

30 August 2017

We have studied the proposal to dredge, and its implementation, since 2007 (Michaels and Oko, 2007, 2010, 2017a; Appendices 1-3; Michaels and Oko 2017b, in press). Our contributions regarding reasonably anticipated and actual project effectiveness were ignored in EPA's first five-year evaluation (US EPA 2012) and in its proposed second five-year review (US EPA 2017). Our studies ignored by EPA focused on all stages of the dredging proposal, starting with EPA's *a priori* assumptions (Michaels and Oko 2007). We concluded that EPA's analysis to justify dredging was biased, based upon our findings that critical assumptions made by the Agency were erroneous, and that all identified errors were made in the dredging-friendly direction rather than randomly.

We then studied dredging while in progress, during Phase 1 of the project, and found critical deficiencies in the project and in monitoring programs to document it (Michaels and Oko 2010). Most recently we studied dredging during and after Phase 2 (Michaels and Oko, 2017a; Appendix 3; and Michaels and Oko 2017b, in press). We reported *negative* Hudson River Superfund Site remediation effectiveness: clamshell dredging massively mobilized sediments, *increasing* PCB contamination rather than decreasing it. Our purpose in providing these comments is to motivate EPA to address the serious concerns that we have expressed both publically and privately regarding the expected and the actual performance of the clamshell dredging project.

Our 2007 and 2010 peer-reviewed *Environmental Practice* articles (Michaels and Oko 2007, 2010; Appendices 1 and 2) predicted that primitive clamshell dredging in the Hudson River would massively mobilize buried PCB sediments, and spread them to an expanding area of river ecosystems that include fish and birds. Clamshells basically are floating backhoes that are useful for navigational dredging. Our 2017 articles (Michaels and Oko 2017a, Appendix 3; Michaels and Oko 2017b in press) analyze the structure of clamshell dredge buckets used in the Hudson River, and the computerized dredge bucket data produced on each closure (the 'bucket files'). We found that 75-80 percent of dredged sediment is returned to the river in mobile form, rather than removed to waiting barges for off-site disposal.

---

<sup>1</sup> Robert A. Michaels, PhD, CEP; RAM TRAC Corporation, Schenectady, NY; ram@ramtrac.com

<sup>2</sup> Uriel M. Oko, PhD, PE; Recycle Management, Glenmont, NY; umoko@nycap.rr.com

Safe PCB dredging requires more advanced hydraulic (suction) technology to minimize toxic sediment mobilization. That's what environmental advocates have advocated, and that's what environmental advocates have achieved, for example, in the New Bedford Harbor in Massachusetts, the Cumberland Bay in Plattsburgh, New York; and in the Fox River in Green Bay, Wisconsin. That's what a year-long advertising campaign said that GE would do in the Hudson River PCBs Superfund Site, though that plan was abandoned in favor of clamshells.

The New York State Department of Environmental Conservation recently reported to the U. S. Environmental Protection Agency that GE's seven-year clamshell dredging project has failed to meet its cleanup goal, *to reduce safely and substantially the long-term downstream transport of PCBs*. This has resulted, most notably, in the project leaving excess PCB levels in fish, which will not abate to acceptable levels for human consumption for most of a century. DEC appropriately called for extensive sampling for PCBs *"all the way to New York City,"* and called on EPA to finish the job and hold GE accountable for cleaning up the Hudson River.

The question of whether remnant PCB-contaminated sediments can be removed via further clamshell dredging, however, depends upon whether PCBs are elevated because dredging remains incomplete, or because dredging was undertaken over a seven-year period. Our research indicates that PCB mobilization constitutes an ecological cost of PCB sediment removal via clamshell dredging. *Mobilization already has far exceeded the minute amounts of PCBs seeping into the river that initially motivated and justified the dredging remedy.*

EPA effectively has obscured this reality by failing to monitor dredge mobilization of PCB sediments, instead focusing on 'resuspension'. As EPA's Peer Review Panel (Peer Review Panel 2012) informing the Agency's first five-year review wrote:

*"There is a very real need to set an allowable load limit for the Hudson River dredging project, but neither the data nor tools needed to do so currently exist. To that end, the project must develop a set of models that incorporate hydrodynamics, sediment transport, fate and transport of PCBs, and bioaccumulation of PCBs in the Upper Hudson River from Fort Edward to Troy Dam" (page 36).*

'Resuspension' vs. 'mobilization' might seem like a distinction without a difference... but it makes a huge difference. Massive amounts of dredged sediment fell back to the river bottom rather than being disposed to waiting barges. Only a tiny fraction of this material is detected in 'resuspension monitoring' at great distance from each dredge site. Indeed, even

this tiny fraction exceeded EPA's engineering performance standard, which resulted in EPA changing the standard and the monitoring location (Michaels and Oko 2010). The massive amounts of sediment dropped back to the river bottom are mobile: they can be and will be moved downstream episodically when storms or other events produce high-flow conditions in the river.

We termed this the '*sediment mobilization discrepancy*'. It represents more than merely a difference between a predicted vs. a measured parameter value. It represents a fundamental inconsistency in EPA's past justification of the need to dredge versus EPA's current characterization of the performance of the dredging project. The need for dredging was justified by the observed, persistent mobility of PCB sediments requiring, according to EPA, their removal via dredging. In contrast, in the new context of actual dredging, EPA dramatically has altered its concept of mobility. *Mobility* in the dredging project is newly quantified by the miniscule fraction of mobilized ('resuspended') PCB that is detected at significant distance downstream. Thus, EPA has ignored nearly all sediment and PCB mobilization in evaluating compliance with the Engineering Performance Standard for *resuspension*. In ignoring mobility of PCB-containing dredge-mobilized sediments for gauging compliance with the resuspension EPS, EPA has ignored a much larger degree of PCB sediment mobility than that which constituted EPA's most essential basis for requiring, in 2007, remediation of the Hudson River PCBs Superfund Site via dredging.

Additional clamshell dredging demanded by many in the environmental community would do more damage. Political correctness cannot change the reality that clamshell dredging was and remains a bad idea for the Hudson River. Its PCB-sensitive species including endangered sturgeon and American eagles already have had more than enough PCB exposure due to clamshell dredging.

Long-term remediation projects undertaken under the Federal Superfund Act or its state equivalents are subject to five-year reviews. As dredging Hudson River PCBs was mandated in 2007, the first five-year review of the project was undertaken as required in 2012 (US EPA 2012). Accordingly, one of us (Michaels) informed EPA of the emerging link between PCBs and possible causation of autism and, in a public comment, suggested that the scheduled five-year review address this issue relative to numerous river communities alongside the path of the dredging project. The five-year review (US EPA 2012), however, neither addressed this issue substantively, nor alluded to it. Indeed, the word 'autism' was absent from the 82-page report. Given the high and increasing prevalence of autism, and its seriousness, cost, and apparent linkage to environmental agents that may include maternal exposure to PCBs during pregnancy, extending the dredging project should be predicated upon satisfactory consideration of this emerging public health issue.



The next five-year review of the dredging project is underway. On 31 May 2017, EPA released the proposed “*Second Five-Year Review*” for public comment. As with the first review, the second neither addresses the autism issue nor alludes to it. Indeed, the word ‘autism’ as before is absent from the 81-page report, notwithstanding several reports in the literature that were cited and considered in Michaels and Oko (2010, 2017a, b). Both published papers predate release of EPA’s proposed “*Second Five-Year Review*.”

The issues of whether EPA should consider the autism issue, and whether the officially completed GE Hudson River dredging project should be extended to remediate remnant PCBs, both must be viewed in the context of EPA’s longstanding special mandate regarding children’s health, embodied by EPA’s *Children’s Health Risk Initiative* (US EPA 2001). In 1997 the Office of Children’s Health Protection was instituted within EPA. Its mission was and remains “to make children’s health protection a fundamental goal of public health and environmental protection... [by] ensuring strong standards that protect children’s health...” In short, EPA must be conservative, not only in protecting the scientific knowledge base, but in protecting public health, including children’s health (Michaels 2017).

Indeed, all three of our already-published papers (Michaels and Oko 2007, 2010, 2017a), which are highly critical of EPA’s project methods and effectiveness, are excluded from citation and from consideration by EPA’s proposed “*Second Five-Year Review*,” just as in 2012 EPA excluded from its first five-year review our two then-existing peer-reviewed published papers. We respectfully call upon EPA to respond to our comments in its upcoming response document, and consider our reports in the final version of the Agency’s “*Second Five-Year Review*.”

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## Appendices

### Appendix 1:

**Michaels, Robert A.; and Uriel M. Oko.** *Bias in the U. S. Environmental Protection Agency's Health Risk Assessment supporting the decision to require dredging PCB-bearing sediments from the Hudson River.* Environmental Practice (Cambridge University Press), 9:96-111, 2007

### Appendix 2:

**Michaels, Robert A.; and Uriel M. Oko.** *Hudson River PCB Dredging: midcourse assessment and implications regarding possible project continuation.* Environmental Practice (Cambridge University Press), 9:377-94, 2010

### Appendix 3:

**Michaels, Robert A.; and Uriel M. Oko.** *Excessive PCBs in the Hudson River: attributable to incompleteness of dredging, or to seven years of dredging?* Environmental Claims Journal, 29(2):115-40, 2017; online: <http://dx.doi.org/10.1080/10406026.2017.1307007>, 25 April 2017

## Appendix 1

**Michaels, Robert A.; and Uriel M. Oko.** *Bias in the U. S. Environmental Protection Agency's Health Risk Assessment supporting the decision to require dredging PCB-bearing sediments from the Hudson River.* Environmental Practice (Cambridge University Press), 9:96-111, 2007

# Bias in the US Environmental Protection Agency's Baseline Health Risk Assessment Supporting the Decision to Require Dredging of PCB-Bearing Sediments from the Hudson River

Robert A. Michaels, Uriel M. Oko

The US Environmental Protection Agency's (EPA) baseline Hudson River health risk assessment (HRA) is evaluated and found to be biased toward keeping polychlorinated biphenyls (PCBs) in sediments. The HRA systematically misquantified parameters, underestimating PCB movement from sediments to water and from water to air. The EPA excluded from its analysis all mono- and dichlorinated PCB congeners, which EPA subsequently estimated at one-third of total PCB mass in the river, and excluded dissolved and colloidal PCB. The EPA included silt-adsorbed PCB, but overestimated the rate at which it would settle out of the water column by inappropriately basing the rate on Stokes' Law for more massive spherical particles. Flat clay particles settle more slowly with a longer path length and residence time. The EPA omitted electrostatic charges on clay particles that separate them, preventing agglomeration and maintaining clay in suspension; they also assumed that particles never "reflect" back into the water column after settling, likewise underestimating PCB concentrations in water. Also omitted was PCB codistillation, in which PCBs at low bulk concentrations preferentially distribute to the air-water interface, accelerating PCB transfer from water to air. Indeed, EPA cited empirical data showing more rapid PCB water-to-air transfer, but reduced its effect on the HRA, reducing the transfer coefficient by averaging in lower modeled PCB transfer coefficients that ignored codistillation. Finally, EPA

omitted PCB release to the atmosphere from hot water in cooling towers in communities along the Hudson River. Water at cooling tower temperatures may release PCB into the air more than 10 times faster than rates determined from the surface of cold water and multiple orders of magnitude more rapidly than in EPA's models. Together, EPA's procedures reduced airborne PCB concentrations from above to below *de minimis* concentrations. This, in turn, eliminated the requirement for EPA's HRA to quantify inhalation risks posed by airborne PCBs; the HRA, therefore, considered airborne PCBs, but attributed zero health risk to them.

Environmental Practice 9:96–111 (2007)

## History and Administrative Procedure

From 1947 to 1977, the General Electric Company (GE) used polychlorinated biphenyls (PCBs; see Figure 1) at Hudson River facilities in Hudson Falls and Fort Edward, directly and indirectly discharging permitted and non-permitted PCBs into the river. These PCBs adhered to river sediments and were transported widely (US Environmental Protection Agency, 2006a). Available records, which were later used to inventory PCBs discharged from GE's two plants during this interval, produced estimates of direct discharges reaching 1,330,000 pounds ( $6.0 \times 10^5$  kg). The actual amount is unknown. Indirect discharges and discharges by other parties and from other sources would be incremental. If the preponderance of disposal was to land, then indirect discharges to the river could have exceeded direct discharges.

PCBs, detected in fish in 1969, were banned from manufacture and commerce in 1974 with passage of the Toxic Substances Control Act. In 1975, the New York State De-

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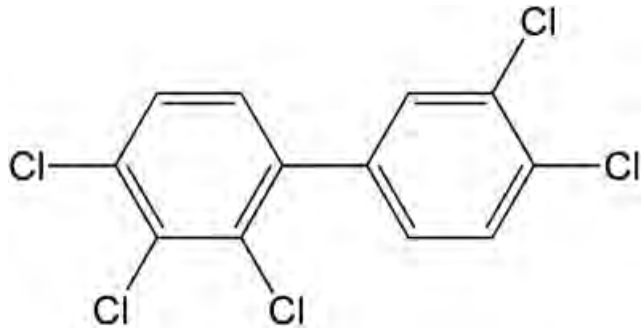


Figure 1. A pentachlorinated PCB congener.

partment of Health issued health advisories to limit consumption of PCB-laden fish, and the New York State Department of Environmental Conservation successfully sued to force GE to study PCB contamination and abatement. Dredging thereby became an administrative issue. In 1984, the US Environmental Protection Agency (EPA) added the Hudson River PCBs Superfund Site to the National Priorities List (NPL), thereby requiring study and possibly remediation under the 1980 Superfund Law.

The 1984 NPL listing decision produced a Record of Decision in which EPA asserted the eventual need to address PCB contamination in the Upper Hudson River. The Record of Decision specified an interim decision, however, to require “No Action” to remediate PCB in sediments, based upon EPA uncertainty about the reliability and effectiveness of available remedial technologies. Accordingly, in 1991 the remediation issue was revisited via a reassessment *Remedial Investigation and Feasibility Study*. Numerous documents support site reassessment, and their full text is available on the Internet (see US Environmental Protection Agency, 2006b). In February 2002, EPA issued a new Record of Decision requiring GE to dredge PCB-contaminated sediments from the Upper Hudson River, beginning with a demonstration project to evaluate the dredging approach.

## Purpose, Scope, and Overview

Administrative procedure under Superfund involves interested parties (stakeholders), by design introducing politics into EPA administrative procedure. The present study addresses the question of whether, despite political influence, dredging is justifiable by the science of health risk assessment (HRA). The EPA apparently justified its decision to require dredging based upon a baseline assessment of PCB risks, not an assessment quantifying PCB risks potentially

posed under dredging scenarios (US Environmental Protection Agency, 1999, 2000a, 2000b). An HRA should compare potential risks under specific dredging scenarios with baseline risks following completion of the demonstration dredging project. For this comparison process to be valid, baseline risks potentially posed by all relevant exposure routes, including PCB inhalation, should have been estimated in a valid and unbiased manner. The present study addresses this issue.

## Selection of Parameters

The issue of bias must be addressed via evaluation of a fair, rather than a biased, selection of EPA’s parameters. A *random* selection of parameters is neither required nor appropriate; we focus narrowly upon *mis-estimated* parameters. Accordingly, our procedure was to evaluate EPA’s analysis and systematically ignore all parameters whose use by EPA was technically justified. Parameters of interest to us are not those of greatest *a priori* concern (quantitatively most important in determining risk). In our investigation, parameters that were accurately estimated were dropped from concern, no matter how important they might have been quantitatively in determining risk. We identified nine parameters whose evaluation by EPA was found to be technically deficient. In short, we did not “cherry-pick” parameters to bias our analysis in a particular direction. Our analysis, of course, is verifiable against cited EPA documents.

## The Criterion of Bias

The bias issue is addressed qualitatively, as well as supported and augmented quantitatively (statistically). Both approaches rely on the simple premise that the direction of errors in analyses of independent (non-covariant) parameters approaches randomness as the number of parameters increases. Randomness of error direction, therefore, is the null hypothesis. Its rejection is justified technically if a low-probability pattern of error directions is observed, such as mis-estimation of a large number of independent parameters in a consistent direction, either permissive to dredging or contraindicating dredging. Observing such a low-probability distribution of error directions, whether or not based upon quantitative (statistical) analysis, would support the conclusion of bias, although not necessarily of intentional bias.

## The Public Policy Issue

Under a consent decree, GE would pay the lion’s share of Hudson River restoration costs. The costs, measured in

hundreds of millions of dollars initially and probably over a billion dollars cumulatively for limited PCB “hotspot” dredging, make the Hudson River a sediment “megasite.” Projected remedial costs far exceed median costs for sediment sites and far exceed costs ranging from \$19,000 to \$812,000 per project paid for achieving the various goals of 37,099 river restoration projects listed in the National River Restoration Science Synthesis database (Bernhardt et al., 2005). For example, median costs for instream habitat improvement projects were reported to be \$20,000; for water quality management, \$19,000; and for channel reconfiguration, \$120,000. These costs impart urgency to the task of revealing any bias, or resolving any appearance of bias, in the scientific analyses informing the dredging decision.

### The Public Health Issue

Adding to the urgency of evaluating possible bias, PCBs have been associated with numerous adverse human health effects (Agency for Toxic Substances and Disease Registry, 2000; Buckley and Tofflemire, 1983; Carpenter, 1998; Carpenter, 2005; Carpenter et al., 2003; Chase et al., 1982; Choi et al., 2003; Hennig et al., 2002; Lucier, 1991; Slim et al., 1999; Stehr-Green et al., 1989; Taylor, Stelma, and Lawrence, 1989). Effects include higher incidence of low-birth-weight infants among residents of zip codes of PCB disposal sites (Baibergenova et al., 2003) and, more recently, higher hospitalization rates for coronary heart disease in zip codes with PCB contamination (Carpenter, 2005). PCBs are animal carcinogens and probable human carcinogens (Agency for Toxic Substances and Disease Registry, 2000).

### Confounding Issues

Dredging has become confounded with equity—essentially, how much GE should pay for damaging the Hudson River and environs. A proper separation of the equity issue from other dredging issues is essential to unbiased, objective, and otherwise competent scientific decision making. We omit consideration of equity issues.<sup>1</sup> Indeed, any penalty or finding of liability assessed against GE can be applied toward dredging and/or used for other purposes. Thus, the amount of any penalty that might be assessed against GE should be unaffected by this article.

### The Opportunity to Decide Issues

The EPA now has postponed dredging to 2009, affording an opportunity to consider whether dredging constitutes the best use of resources. For example, could possible adverse PCB health effects be offset more effectively via less

expensive but more health-enhancing strategies, such as health club memberships for families residing along the Hudson River? More germane to PCBs, could greater health benefits be derived by using GE funds to establish a research institute focusing on local epidemiological issues? Resolution of these issues is outside our scope. We focus narrowly on evaluating the possible role of bias in EPA scientific analyses to decide whether or not Hudson River PCBs might pose unacceptable risks under a dredging and/or non-dredging (“baseline”) scenario.

## Methods

This investigation adopts the methods of health risk assessment (HRA) and health impact assessment (HIA) to identify parameters used by EPA to assess baseline (non-dredging) health risks potentially posed by PCBs in the Hudson River and, essentially, peer review their quantification based upon EPA documentation. Two criteria were used to determine whether effective insulation of science from politics was attained: (1) whether parameter values were estimated accurately, and (2) with respect to any parameters evaluated inaccurately, whether the direction of estimation error was mixed or whether it consistently overestimated or underestimated potential PCB transfer from Hudson River water to air. Overestimating the risk of transferring PCBs from sediments to water and water to air in the vicinity of Hudson River communities could contraindicate dredging, whereas the reverse error would be conducive to dredging.

The null hypothesis is absence of bias. This corresponds to finding a random distribution of errors, not to finding an absence of errors. Any finding of significant *systematic* error in either direction constitutes evidence of bias, justifying rejection of the null hypothesis.

### Statistical Analysis

We determined whether each parameter examined was estimated correctly. If EPA’s evaluation of a parameter was grossly inaccurate, we included it among parameters to be examined statistically to determine whether the distribution of the directions of mis-estimation was non-random. Each parameter that is estimated inaccurately must be overestimated or underestimated (otherwise, it is accurate). If these outcomes can be assumed to be equally probable, then occurrence of each is associated with an equal expected probability of 0.5 (50%, or “fifty-fifty”). If the parameters also are independent (mis-estimating one

parameter does not affect estimation of another), then any two randomly selected parameters that are mis-estimated would have a 0.25 probability ( $P = 0.5 \times 0.5 = 0.25$ ) of being mis-estimated in a direction more permissive to dredging and, likewise, 0.25 would be the probability of the same two parameters being mis-estimated in a direction less permissive to dredging.

In general, the probability of mis-estimating all of  $n$  parameters consistently in a particular direction by chance alone is  $0.5^n$  where, for example, the probability of mis-estimating five out of five parameters in a direction permissive to dredging would be 0.03 ( $P = 0.5^5 = 0.03$ ). When probabilities reach such low values, below the usual 0.05 criterion of scientific uncertainty, the null hypothesis of randomness is rejected. Speaking qualitatively, bias in the outcome of EPA's analysis (possibly unintentional) would be inferred.

## Secondary Methods

Secondary methods also were applied. They are not *a priori* methods and they are not described in detail here. Rather, they are the diverse methods typical of peer review, which most essentially consists of considering the scientific merit with which numerous methods were selected for use and applied in the original analyses supporting the dredging decision. Readers can judge for themselves whether or not we applied the methods of HRA, HIA, and peer review objectively.

## Findings

### EPA Identification of Parameters Used in Assessing Potential Risks Posed by PCBs

The number of parameters describing the dynamics of PCBs entering the water column from sediments and entering the air from the water column are diverse and numerous, numbering in the hundreds or thousands. The number visible in any scientific explication of this issue depends upon the degree of detail with which the analysis is conducted. The parameters include initial concentrations of all 209 PCB congeners (from monochlorinated to decachlorinated biphenyls) in each medium, bulk amounts, areas involved, and depths of water and sediments, as well as parameters describing the physical, chemical, and environmental degradation (such as half life), transformation (such as dechlorination), and other environmental dynam-

ics (such as solubility, boiling point, volatilization, and vapor density) of these numerous congeners. The safety issue also encompasses toxicological parameters of each PCB congener. The full list of such parameters is too long to elucidate in detail here.

Fortunately, the present analysis requires no such highly detailed elucidation. The parameters that are of greatest concern here are those that are most susceptible to being overestimated or underestimated, especially if by a wide margin, or overlooked entirely. These are the parameters (unlike, say, molecular weights, which are known to a high degree of accuracy) whose estimated values substantially may depend upon who is doing the estimating. Quantification of these parameters can vary from liberal to conservative, depending upon whether the estimator has an (conscious or unconscious) agenda other than to conduct a purely scientific analysis . . . in short, a bias. Nine such estimated, determinative parameters that were (or should have been) used for technical analysis in the baseline HRA supporting the dredging decision were identified in the current study, as follows:

1. *Mobilization of sediment-borne PCBs in dredging.* Sediment-borne PCBs will become mobilized by dredging. The amount mobilized depends upon the dredging method. Mobilization must be considered in assessing the potential public health significance of PCB dredging;
2. *PCB congeners to be included in the analysis.* All 209 PCB congeners should be included;
3. *Phases of PCBs to be included in the analysis.* All phases should be included, most notably PCBs that are adsorbed onto particles, molecular PCBs that are dissolved, and particulate PCBs that are colloidal;
4. *Precipitation of PCB-bearing sediment particles from the water column.* Precipitation rates should be quantified realistically, because this parameter is important in determining the rate of PCB removal (to sediments) and the resulting PCB concentration in the water column;
5. *Electrostatic charges on PCB-bearing sediment particles in the water column.* Clay sediment particles resuspended in water (as by dredging) tend to exhibit negative surface charges. Such particles are maintained in suspension by electrostatic interaction of the negative surface charges with cations (positive ions) in the water. This electrostatic charge configuration inhibits agglomeration. It should be accounted for because of its potential importance in inhibiting settling of clay particles and removal of adsorbed PCB from the water column;



6. *Reflection coefficient of precipitating PCB-bearing sediment particles.* The reflection coefficient quantifies the tendency of particles, once settled out of the water column, to return to the water column as a result of “bouncing.” The reflection coefficient should be quantified and is especially important for particles of low mass or likely to be affected by currents, as in the Hudson River;
7. *PCB codistillation.* Codistillation is a chemical process well documented for PCBs. It results from molecular attraction to surfaces. For PCBs, these surfaces include the air-water interface in lakes and rivers. Entry of PCBs into air from water is significantly faster and more extensive in a given interval than would be the case if the same mass of waterborne PCBs were assumed to be distributed evenly throughout the water column (as quantified by the “bulk concentration”). Accurate estimation of waterborne PCB entry into the air that people will breathe requires quantification of PCB codistillation;
8. *Empirical measurement of airborne PCBs over PCB-contaminated waters.* Empirical measurements, to the extent available, should be used for validating modeled relationships, such as models of PCB entry into the air from Hudson River water;
9. *Warm water sources of Hudson River PCB entry into the atmosphere.* Warm water occurs at near-shore locations where cooling water is discharged from industrial facilities and, before discharge, in cooling towers supplied by Hudson River water. These sources of potential entry of PCBs into the atmosphere near population centers must be accounted for when assessing potential public health significance of PCBs and the possibly increased significance to public health if PCB dredging is undertaken.

The technical merit of EPA quantification of each parameter described above is evaluated sequentially in the following subsections.

#### Mobilization of Sediment-Borne PCBs in Dredging

PCB mobilization must be considered in assessing the potential public health significance of PCB dredging. Its consideration by EPA, however, was inadequate. PCB mobilization exacerbated by dredging depends upon three types of causes:

1. sediment disruption, as by extreme weather events or barge sinkings;
2. the method of dredging; and

3. accounting in full, rather than in part, for PCBs that might be mobilized.

#### *Sediment Disruption by Extreme Weather Events*

Research undertaken by Joel Baker and colleagues at the Chesapeake Biological Laboratory in Maryland simulating Hudson River PCB dredging (Baker et al., 2001) revealed that EPA modeling lacked spatial resolution high enough to predict PCB mobilization reliably. They concluded that errors, which could have gone in either direction, probably had in fact underestimated sediment and PCB mobilization from extreme weather events. The authors used this finding to argue in favor of dredging, fearing that harmful PCBs would be mobilized in future years if dredging did not remove them sooner; however, removal by dredging presumably also could exert a nearer-term effect episodically.

#### *The Method of Dredging*

The EPA’s assessment regarding the Hudson River PCB site was prepared in 1999 and 2000, when GE planned to dredge hydraulically via the “suction” method. Indeed, a television commercial campaign by GE impugned the “clamshell” or “bucket” method of dredging as being too dirty. Since preparation of the HRA, however, GE’s proposal has reverted to use of the clamshell method.

#### *Accounting in Full for PCBs That Might Be Mobilized*

The mass of PCB that will be mobilized may be expressed as a fraction of the inventory of PCB in Hudson River sediments. If the inventory is underestimated, mobilization will be underestimated commensurately. This source of underestimation is addressed with respect to other parameters, below.

In short, EPA’s modeled estimate of PCB mobilization from sediments to the water column and from the water column to the air, together contributing to potential PCB inhalation risks, failed to include important potential sources of PCBs and therefore is unreliable for predicting dynamics in the Hudson River if dredging of PCB-bearing sediments at hotspots actually is undertaken.

#### PCB Congeners to be Included in the Analysis

All PCB congeners should be included in the inventory of PCBs in Hudson River sediments (Figure 1). Mono- and dichlorinated PCBs, however, were excluded from the in-

ventory of PCBs in Hudson River water, thereby underestimating waterborne PCBs subject to becoming airborne. Several figures in the revised Hudson River HRA (US Environmental Protection Agency, 1999, 2000a, 2000b) depict a precipitous falloff of “total tri+ PCB congener water column concentrations” within approximately 10 meters of the dredge site. PCB congeners can bind from one to ten chlorine atoms. If each number of chlorines were represented equally, exclusion of the monochlorinated and dichlorinated PCBs would represent two of ten (20%). The actual fraction (weight-percent) excluded is unclear because commercial PCBs were sold as Aroclors (for example, Aroclor 1254 with 54 weight-percent chlorine), such that each Aroclor product sold had a distinctive distribution of mono- to decachlorinated PCB congeners (hence the ability to “fingerprint” PCB sources). In addition, PCB degradation in sediments results in gradual dechlorination, which tends to deplete the high-chlorine congeners and enrich the low-chlorine congeners . . . precisely the congeners that were excluded from the figures and which apparently were excluded from consideration in quantifying PCB release from river water to air. The fraction of total PCBs represented by the monochlorinated and dichlorinated PCBs would appear to be about one-third, as suggested by an EPA estimate described below.

The plan to dredge Hudson River sediments selected one option from among several remediation options. The option favored by environmentalists, “Alternative no. 5,” would remove 155,000 pounds of PCBs, compared with 1.3 million pounds (650 tons, or approximately 600,000 kg); the latter is the amount reported to have been deposited into the Hudson River by GE from its two upriver capacitor plants before PCBs were banned from US commerce by the Toxic Substances Control Act of 1976. Responding to criticism of the plan to dredge only 100,000 pounds of PCBs under a less ambitious option, GE provided “new data” to the EPA that showed that the actual amount of PCBs that would be dredged from the river bottom under Alternative no. 5 would be 150,000 pounds, almost identical to the amount preferred by environmental groups (Cappiello, 2001):

The US EPA says it can dredge 50 percent more PCBs from the Hudson River without increasing the volume of sediment removed. (Cappiello, 2001)

By way of explanation, EPA indicated that it simply had refined its PCB estimate of a year earlier; they did this by including previously-excluded monochlorinated and dichlorinated PCBs, on the rationale (according to TAMS Consultants) that “fish principally absorb [higher chlorinated] PCBs.”

The EPA apparently assumed that the monochlorinated and dichlorinated PCBs constituted one-third of the total PCBs (50,000 pounds out of 150,000 pounds of the total PCBs). Clearly, EPA’s HRA of 1999 (US Environmental Protection Agency, 1999) and 2000 (US Environmental Protection Agency, 2000a, 2000b) for Hudson River dredging therefore excluded approximately one-third of the total PCBs from the PCB inventory. This was done notwithstanding that the scope of the Hudson River HRA included the airborne risks, not just fish consumption risks, that might be posed by PCBs resuspended and mobilized by dredging. This exclusion, however, did not stop EPA from taking credit for the extra 50,000 pounds of PCBs assumed to be accounted for by the monochlorinated and dichlorinated PCBs to augment the acceptability of its dredging plan in the face of criticism in 2001.

The EPA actions described above highlight three issues relating to potential bias in the scientific analysis:

1. whether EPA accurately inventoried the amount of PCBs that might pose risks to health;
2. whether EPA accurately assessed risks potentially posed by PCBs in its PCB inventory (addressed in greater detail later); and
3. whether the PCB risks quantified in the HRA corresponded to the PCB amounts that would be dredged and subject to mobilization, with the potential to pose health risks.

The findings indicate that EPA based its risk estimates on a smaller pool of PCBs; they indicate further that this was done in part by excluding monochlorinated and dichlorinated PCB congeners from the HRA. The EPA did this, notwithstanding that the excluded congeners would necessarily be included in sediments that would be dredged and therefore would contribute to airborne PCB concentrations and health risks that might be posed to people situated near the river. In short, EPA’s modeled estimate of PCB residue load contributing to potential PCB inhalation risks failed to include important potential sources of PCBs and therefore is unreliable for predicting dynamics in the Hudson River if dredging of PCB-bearing sediments at hotspots is indeed undertaken.

#### Phases of PCBs to be Included in the Analysis

All phases should be included, most notably PCBs that are adsorbed onto particles, molecular PCBs that are dissolved, and particulate PCBs that are colloidal. All PCBs in the HRA, however, were assumed to settle under Stokes’

Law for spherical silt particles. This assumption constitutes a continuous process of removal of PCBs from the water column, notwithstanding that molecular and dissolved PCB phases would remain, because they do not settle. That is, these waterborne PCBs are subject to becoming airborne, but this is not accounted for in EPA's HRA.

The mechanical action of dredging hotspots will cause PCBs that are adsorbed to silt particles to enter the water column. Whereas much, if not most, of the PCB in the water column will remain adsorbed to silt, a significant, possibly majority fraction will enter the water column in a dissolved (molecular) or a colloidal phase (consisting of microscopic PCB droplets). Exclusion of PCBs in these dissolved and colloidal phases from the revised Hudson River HRA is reported in Appendix E, Section 5.2, titled "TSS Plume Estimates." In that section, only silt particles were used to estimate settling rates:

Since data on settling rates were not available, a median value for settling velocity of  $1.9 \times 10^{-4}$  M/sec [16.5 M/d] was used in the transport calculations. (US Environmental Protection Agency, 2000b)

The above description of settling velocity as a "median value" suggests misleadingly that settling was calculated for a heterogeneous distribution of particles whose median settling velocity is  $1.9 \times 10^{-4}$  M/sec [16.5 M/d]. In fact, only the "median" value was used. This uniform settling velocity, corresponding to a 20-micron ( $\mu$ M) sphere, excludes dissolved and colloidal PCBs, which are smaller. Dissolved PCBs (bound to water) and colloidal PCBs (subject to Brownian motion and water turbulence) never settle. This unstated simplification overestimates the rate of PCB removal from the modeled water column by assuming that all waterborne PCBs are adsorbed to particles that settle at the assumed velocity. Actually, a significant, if not predominant, fraction of total waterborne (resuspended) PCBs will consist of free PCBs present in dissolved and colloidal phases.

Inasmuch as silt has a specific gravity of about 2.5, the assumed "median" settling velocity corresponds to (spherical) particles of diameter exceeding 20  $\mu$ M, whereas Stokes' Law ceases to apply when the settling particles are fines that are less than about 50  $\mu$ M. The EPA's implicitly assumed particle size therefore, also implicitly, assumes that the vastly more numerous PCB molecules in dissolved and colloidal phases will settle at the median rate. Colloidal PCBs are commonly recognized as being 1  $\mu$ M and smaller and, of course, individual PCB molecules are smaller still. These PCB molecules and colloids also would suspend in

the water phase even beyond the dredge site perimeter of perhaps 20 M. Molecular and colloidal PCBs can remain in the water, suspended as globules of pure PCBs that are smaller than 20  $\mu$ M, without being captured by silt curtains and without settling at all:

PCB in colloidal form constitutes the most mobile form of PCB in water, being affected only minimally by settling, physical retention or adsorption. Concentrations of PCB-like compounds in water can be much higher in colloidal form than in suspended solids or in dissolved form, and can be much more difficult to intercept through physico-chemical means. (Paquin, 2001, p. 2)

Indeed, molecular and colloidal phases of PCBs together reasonably may be expected to constitute a significant, possibly the predominant, fraction of total PCBs in the water column, as illustrated by Table 1. Table 1 shows a site at which dissolved and colloidal PCBs together amounted to 54% of the total waterborne PCBs.

An EPA review of experience of dredging PCBs shows that dredging hotspots can disperse waterborne PCBs beyond a 20-meter envelope ("silt curtain") around a dredge site, with observed concentrations of 0.1 to 0.2 ppm (100 to 200  $\mu$ g/L, or 100,000 to 200,000 ng/L). This is approximately 3,000 to 6,000 times the PCB concentration assumed under a non-dredging scenario in the HRA prepared in support of another project (specifically, the PSEG Power New York proposal to site the Bethlehem Energy Center gas-fired power plant on the Hudson River at Bethlehem, New York; see Oko and Oko, 2001; PSEG Power New York, 2001). In this higher waterborne PCB concentration range, resulting airborne PCB concentrations were reported to have exceeded safe concentrations. Indeed, EPA's HRA Appendix E states the following:

**Table 1.** Breakdown of forms under which PCB contamination is associated in groundwater at a Smithville, Ontario, Canada, site during the period 1994 to 2001; data compiled from 55 sampling campaigns

Form present	Concentration of PCBs in groundwater ( $\mu$ g/L)		
	Range	Average	Proportion (%)
suspended	0-119	7.7	46
colloidal	0.4-19	6.0	36
dissolved	0.2-8	3.0	18
Total	1-129	16.8	100

Source: Paquin, 2001.

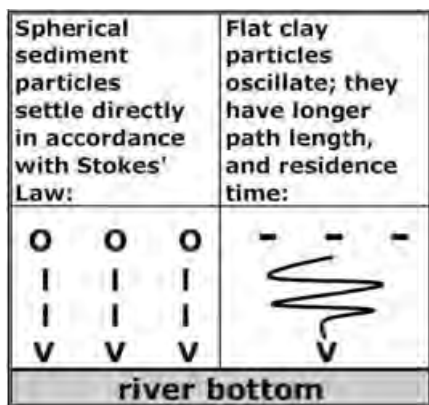
While these estimates of total tri+ PCB congener concentrations represent cumulative concentrations, dissolved or particulate tri+ PCB congener concentrations may be of even greater interest. *In particular, the dissolved water column concentrations tend to be of greater concern because of their increased bioavailability.* (US Environmental Protection Agency, 2000b, p. 59; emphasis added)

In short, EPA's modeled estimate of PCB residue load contributing to potential PCB inhalation risks failed to include important sources of PCBs in water and therefore is unreliable for predicting dynamics in the Hudson River if dredging of PCB-bearing sediments at hotspots is indeed undertaken.

### Precipitation of PCB-Bearing Sediment Particles from the Water Column

Precipitation rates should be quantified realistically, because they in turn quantify the rate of removal from the water column of PCBs that have been resuspended and mobilized by dredging. Instead, the residence time of flat, PCB-bearing clay particles in river water was quantified unrealistically, based upon the more rapid precipitation of spherically shaped particles acting in accordance with Stokes' Law (Figure 2). This procedure underestimated waterborne PCBs and thereby also underestimated the amount of PCBs that would become airborne.

Mathematical treatment is simplified when a spherical shape for fine particulates is assumed, which is the case in Stokes' Law. This assumption, however, predicts faster than natural settling rates because, in nature, spherical particles are rare. Disks, rod shapes, and irregular random shapes are more common and these shapes settle more slowly than



**Figure 2.** Settlement of waterborne particles to a river bottom: path length and settling rate of spherical versus flat particles.

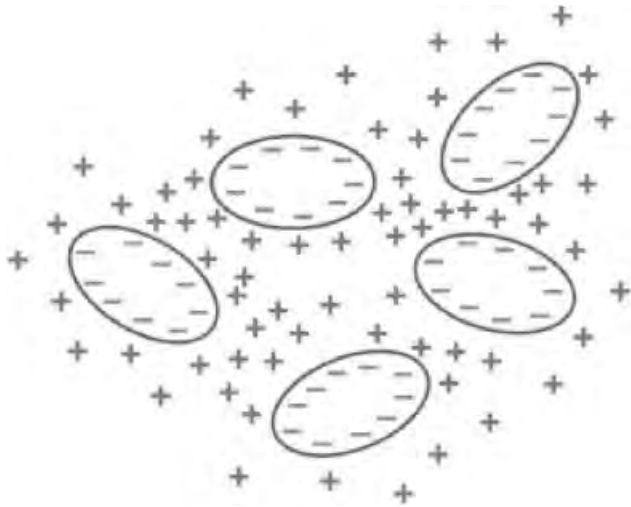
spheres. Mathematical predictions of settling rates that do not account for irregular shapes can predict a 100% faster settling rate at the >20- $\mu$ M particle size range and more than 1,000% faster at the <10- $\mu$ M size range.

Clay is abundant in the Hudson River region and would constitute a significant, if not the preponderant, fraction of PCB-contaminated sediment particles that will be resuspended and mobilized during dredging. Flat clay particles settle via a side-to-side oscillation during descent, greatly increasing their path length and residence time in the water column; that is why they settle more slowly than as predicted by Stokes' Law. Such delay in exiting the water column reasonably would be expected to increase the concentration of PCB-laden particles in the water column markedly, much as delays at highway exits markedly increase traffic on the highway. In short, EPA's modeled estimate of the suspended silt cleansing rate failed to include important properties of PCBs bound to sediments and therefore is unreliable for predicting dynamics in the Hudson River if dredging of PCB-bearing sediments at hotspots is indeed undertaken.

### Electrostatic Charges on PCB-Bearing Sediment Particles in the Water Column

Clay sediment particles resuspended in water (as by dredging) tend to exhibit negative surface charges. Such particles are maintained in suspension by electrostatic interaction of the negative surface charges with cations (positive ions) in the water column. This electrostatic charge configuration inhibits agglomeration of fine silt particles resuspended by dredging. Electrostatic charges should be accounted for because of their potential importance in inhibiting settling of clay particles and removal of adsorbed PCBs from the water column of the Hudson River at dredging sites.

Electrostatic charges should be modeled, but instead they were ignored. By this omission, EPA fails to account for prolonged suspension in the water column of charge-separated PCB-bearing clay particles; it thereby also underestimates waterborne PCBs subject to becoming airborne. Most fine particles, in part because of their high surface-area-to-volume ratio, tend to become electrostatically charged in water (Figure 3). Again, clay sediment particles resuspended in water tend to exhibit negative surface charges. The similar charges cause the particles bearing them to repel one another. The space between charge-separated negatively charged particles then is filled with cations (positive ions) already present in the water column. This configuration of charge separation increases particle residence



**Figure 3.** Charge separation of particles suspended in water. (Source: Historically Black Colleges & Universities/Minority Institutions, 2007.)

times in the water column. Some charge-separated particles will not settle at all. Electrostatically separated PCB-bearing particles that do not settle remain in the water column, from which they are more available than settling particles to enter the atmosphere, where they may pose airborne risks.

By excluding this potentially significant factor from the analysis of settling of suspended particles in the Hudson River water column, EPA overestimates the settling velocity of PCB-laden particles to the river bottom and thereby underestimates the likely concentration of PCBs in the water. In short, EPA's modeled estimate of suspended silt cleansing rate failed to include important properties of clay particles bearing PCBs and is therefore unreliable for predicting dynamics in the Hudson River if dredging of PCB-bearing sediments at hotspots is indeed undertaken.

### Reflection Coefficient of Precipitating PCB-Bearing Sediment Particles

The reflection coefficient should be quantified, because it constitutes a potentially significant source of return to the water column of PCB-bearing silt particles of relatively low mass. If 20% of low-mass particles encountering the substrate are swept by currents back into the water column, then EPA's underestimation of the suspended particle population in the water column, arising from omitting a reflection coefficient, would be 20%. We don't know what (if

any) single value of the reflection coefficient should be assumed for the Hudson River or what multiple values might be assumed at each location in the river, under varying flow conditions. Clearly, however, EPA incorporated no reflection coefficient at all (or, equivalently, a reflection coefficient of zero was incorporated) in calculating PCB removal rates from the water column. This procedure thereby underestimated waterborne PCBs subject to becoming airborne.

The rate of free settling in water of silt particles influenced by earth's gravity can be predicted from particle size and the specific gravity of discrete particles. At the bottom of settling columns where the particles compact, however, other mechanisms take over. One of these processes is reflection (Shavit, Moltchanov, and Agnon, 2003), which refers to the fact that particles of low mass may bounce off the substrate on which they land. The mass of particles that might be swept back into the water column after settling to the substrate would be expected to be greater in flowing waters, such as in the Hudson River and in laboratory wave chambers (Shavit, Moltchanov, and Agnon, 2003).

Similarly, colloids may remain in suspension indefinitely as a result of bouncing off water molecules with which they collide (a well-documented phenomenon termed Brownian motion). The phenomena of reflection and bounce occur in a zone of activity termed the "hindered zone" of settling. Failure to incorporate a reflection coefficient when calculating settling of PCB-laden particles in the Hudson River water column tends to underestimate particle and PCB concentrations in the water, just as traffic could be underestimated on a highway if the model used fails to count a high fraction of exiting vehicles that immediately reenter the highway. In short, EPA's modeled estimate of suspended silt cleansing rate failed to incorporate a reflection coefficient and is therefore unreliable for predicting dynamics in the Hudson River if dredging of PCB-bearing sediments at hotspots is indeed undertaken.

### PCB Codistillation

Empirical measurements should be used to validate model assumptions made in quantifying PCB entry into the air. Instead, available empirical measurements were diluted with modeled values (see below), thereby underestimating the water-to-air transfer coefficient. Accurate estimation of waterborne PCB entry into the air requires quantification via accounting for PCB codistillation. By ignoring PCB codistillation in quantifying the water-to-air PCB transfer coefficient, EPA underestimated waterborne PCBs subject

to becoming airborne. A recent news item (Anonymous, 2001) based upon research conducted by the Integrated Atmospheric Deposition Network (2000) reveals that codistillation has transferred nearly two tons of PCBs from Lake Ontario to the atmosphere between 1992 and 1996. According to a news report describing this startling finding,

The Great Lakes have begun to “exhale” significant quantities of chemicals, including . . . PCBs . . . , releasing them into the atmosphere. . . . Researchers say . . . the lakes begin *naturally cleansing themselves* through the volatilization process (i.e., evaporating pollution off the water surface). The latest figures from the Integrated Atmospheric Deposition Network (IADN) *show a net release from Lake Ontario alone of almost two tons of PCBs into the air . . . from 1992 through 1996. . . .* (Anonymous, 2001, p. 9; emphasis added)

That’s a half ton (nearly 500 kg) of PCBs *each year* codistilling from the surface of a cold lake. Codistillation, however, also is temperature dependent. Thus it would occur at a greater rate, and to a greater degree, in warm water, such as in Hudson River water heated during industrial use as a cooling fluid, then itself cooled in cooling towers before return to the river. The EPA’s failure to account for codistillation might be explained by unfamiliarity with the phenomenon, as well as by an unwillingness to give appropriate credence to empirical data arising from credible reports. In short, EPA’s modeled estimate of assumed water-to-air PCB transfer rate failed to include consideration of codistillation and is therefore unreliable for predicting dynamics in the Hudson River if dredging of PCB-bearing sediments at hotspots is indeed undertaken.

## Empirical Measurement of Airborne PCBs over PCB-Contaminated Waters

The degree to which EPA was familiar with PCB codistillation cannot be inferred with certainty. Such familiarity, however, should have been unnecessary for enabling EPA to quantify accurately PCB water-to-air transfer coefficients, inasmuch as empirical measurements cited by EPA had been made to quantify them. Indeed, the revised Hudson River HRA (US Environmental Protection Agency, 2000a, 2000b), Appendix B, cites nine empirical measurements of airborne PCB concentrations (Buckley and Tofflemire, 1983) contributing toward estimating the transfer coefficient of PCBs from water to air (US Environmental Protection Agency, 2000b; see EPA’s Table B-1). These and possibly other measurements were used by EPA to produce PCB water-to-air transfer coefficients (as summarized in this article’s Table 2; also see EPA’s Table B-2 and the original data source, Harza Engineering Co., 1992):

These data can be used to estimate an empirical water to air transfer coefficient, representing the ratio of the PCB concentration in air divided by the PCB concentration in water. Using the detected PCB concentrations in air and water summarized in Table B-2, empirical air-water transfer coefficients range from 0.02 to 0.4 ug/M<sup>3</sup> per ug/L, with a median value of 0.09, and an average value of 0.15 (ug/M<sup>3</sup> per ug/L). (US Environmental Protection Agency 2000a, p. 18)

The EPA expressed surprise about the magnitude of these measured values, however, possibly because EPA was unfamiliar with codistillation. In that case, EPA would have expected the transfer coefficients to be lower than those

**Table 2.** The US Environmental Protection Agency’s Health Risk Assessment: modeled versus measured airborne PCB concentrations

Measured airborne PCB concentrations at 1-meter altitude		Empirical water-to-air transfer coefficient			
range		range		median	mean
from	to	from	to		
(ug/M <sup>3</sup> )		(ug/M <sup>3</sup> per ug/L)			
0.033	0.53	0.02	0.4	0.09	0.15
Airborne PCB concentrations resulting from water-to-air transfer					
measured range		modeled range		measured/modeled	
from	to	from	to	from	to
(ug/M <sup>3</sup> )		(ug/M <sup>3</sup> )		...	...
0.033	0.53	0.00012	0.00021	157	4,417
(assumes PCB flux = 13 ug/s)					

Source: US Environmental Protection Agency, 2000a, 2000b.

suggested by the measurements. Further investigation could have elucidated the explanation for the higher-than-expected PCB water-to-air transfer coefficients, but further investigation apparently was not undertaken.

Instead, the measured values described above were assigned a low weighting. This EPA accomplished via adulteration of the nine empirically derived transfer coefficients with two lower transfer coefficients derived via two modeling approaches (Table 2). The two modeling approaches ignore codistillation, instead producing transfer coefficients consistent with Henry's Law acting on bulk PCB concentrations, that is, assuming even distribution of PCBs throughout water. Model results expressed in units of  $\text{ng}/\text{M}^2 \text{ sec}$  per  $\text{ng}/\text{L}$  could not be compared directly with the empirical values expressed in  $\text{ug}/\text{M}^3$  per  $\text{ug}/\text{L}$ . The units were brought into line, and the comparison made, via use of the average PCB concentration in the river ( $24 \text{ ng}/\text{L} = 0.024 \text{ ug}/\text{L}$ ; US Environmental Protection Agency, 2000a, p. 18). The EPA used this concentration to produce a flux ( $13 \text{ ug}/\text{sec}$ ; US Environmental Protection Agency, 2000a, p. 19) which, using the median empirical transfer coefficient (0.09), generated a modeled airborne concentration of  $0.00012$  to  $0.00021 \text{ ug}/\text{M}^3$  (US Environmental Protection Agency, 2000a, p. 20), compared with  $0.033$  to  $0.53 \text{ ug}/\text{M}^3$  detected empirically (US Environmental Protection Agency, 2000a, p. 20). This corresponds to a factor of a 157 to 4,400 difference between the modeled versus empirical data ( $0.53/0.00012 = 4,417$ ;  $0.033/0.00021 = 157$ ). That is, the modeled water-to-air transport factors downwardly biased the estimated transfer of PCBs from Hudson River water to the atmosphere by a factor ranging from as little as  $1/4,400$ th to  $1/157$ th of the empirically determined values.

The EPA's preference for modeled transfer coefficient values biased the expected concentration of airborne PCBs over

the river surface in a direction favorable to EPA's dredging proposal and, in this sense, this action was self-serving. It was sufficiently self-serving to reduce airborne PCB estimates to below levels of concern to EPA and below levels of concern to the New York State Department of Environmental Conservation. Specifically, EPA's weighting procedure diminished assumed airborne PCB concentrations from above published *de minimis* levels, requiring quantitative risk assessment, to concentrations below *de minimis* levels, not requiring quantitative assessment of risks potentially posed by inhalation of mobilized PCBs that might become airborne as a result of dredging (Table 3). Contrary to EPA's routine procedure of validating its air models against reality via use of dyes or other markers, in this case EPA effectively invalidated empirical data based upon real-world data failing to conform to EPA's air model. In short, EPA's modeled estimate of the water-to-air PCB transfer rate failed to incorporate empirical evidence about water-to-air transfer of PCBs and is therefore unreliable for predicting dynamics in the Hudson River if dredging of PCB-bearing sediments at hotspots is indeed undertaken.

#### Warm Water Sources of Hudson River PCB Entry into the Atmosphere

Potential warm water sources of Hudson River PCB entry into the atmosphere, such as cooling towers, must be accounted for in assessing the potential public health significance of airborne PCBs under any dredging scenario. Instead, PCB concentrations resulting from water-to-air transfer were estimated based upon unheated (relatively cold) river water. According to the revised HRA for the Upper Hudson and Mid-Hudson River (US Environmental Protection Agency, 2000a):

The concentrations of PCBs in air were calculated from a combination of historical monitoring data and modeled emissions *from the river*. . . (US Environmental Protection Agency, 2000a, p. ES-4; emphasis added)

**Table 3.** Regulatory effect of adjusting PCB concentrations measured in air via incorporation of lower, modeled concentrations

Measured PCB range		New York State Department of Environmental Conservation DAR-1* <i>de minimis</i> concentration for PCB	Modeled PCB range	
from	to		from	to
(ug/M <sup>3</sup> )		(ug/M <sup>3</sup> )	(ug/M <sup>3</sup> )	
0.033	0.53	0.1	0.00012	0.00021

\*Source: New York State Department of Environmental Conservation, 1997.

The water temperature in cooling towers may be elevated to approximately 100° F (56° C) above that of the ambient river water source.

For every 10° C rise in temperature, the rate of a physical reaction, such as the rate of PCB codistillation, may be expected roughly to double. The rate of PCB transfer from water to air occurring with a 40° C water temperature increase, accordingly, would be expected to undergo four doublings. Thus, the rate at which PCBs in cooling tower water might be expected to escape to the air from water at a temperature of, say, 45° C (113° F) in a cooling tower would be approximately 16 times greater than that in a source of Hudson River water at a temperature of 5° C (41° F).

If dissolved and/or colloidal PCBs rise to 10 ug/L (parts per billion by weight) during dredging, the weight of PCBs entering the cooling tower under one project proposal (the Bethlehem Energy Center power plant; see Oko and Oko, 2001; see PSEG Power New York, 2001), based on a 4,500 gallon/minute uptake, would be 0.25 kg/d (approximately 0.1 tons/year). Examination of studies forming the basis for the passage quoted above pertaining to transfer of PCBs from river water to air, however, reveal no studies addressing PCB release from warm water in cooling towers. In short, EPA's modeled estimate of water-to-air PCB transfer rate failed to incorporate consideration of transfer from heated water and is therefore unreliable for predicting dynamics in the Hudson River if dredging of PCB-bearing sediments at hotspots is indeed undertaken.

#### Summary of EPA Quantification of Parameters Used in Dredging Decision Making

As documented above, EPA evaluation of the nine subject parameters addressed in this study systematically has underestimated concentrations of PCBs that could, and presumably would, become airborne under non-dredging and dredging scenarios. Adoption of simplifying assumptions in modeling river flow, precipitation of suspended particles, and PCB dynamics can result in omission and/or unreliable quantification of important parameters contributing to overall PCB-associated risk. That this indeed has occurred is hinted at in Section 5 ("Assessment of Water Quality Impacts") of Appendix E of EPA's revised HRA for the Hudson River (US Environmental Protection Agency, 2000b):

A complete evaluation of water quality impacts requires integrating a calibrated hydrodynamic model of the system with a water quality model capable of predicting changes due to

*advection, turbulent diffusion, and settling of the suspended particles. Such a model is beyond the scope of this evaluation. (US Environmental Protection Agency, 2000b, Section 5, p. 12; emphasis added)*

## Discussion and Conclusions

### Statistical Significance

A parameter that is estimated inaccurately must be overestimated or underestimated; otherwise it is estimated accurately. If these two alternative directions of mis-estimation are equally probable, as they should be, then occurrence of each is associated with an expected probability of 0.5 (50%, or "fifty-fifty"). If the parameters also are independent (under- or overestimating one does not cause mis-estimation of another), then any two randomly selected parameters that are mis-estimated would have a 0.25 probability of being mis-estimated in a direction more permissive to dredging and, likewise, 0.25 would be the probability of the same two parameters being mis-estimated in a direction less permissive to dredging;  $0.50 [1.0 - (0.25 + 0.25)]$  would be the probability of one mis-estimation being in the dredging-permissive direction and the other in the dredging-prohibitive direction. The confluence of fully nine parameters linked in a single direction, as reported above in the "Findings" section, would be associated with a vanishingly small probability of occurring by chance alone— $0.5^9$ , which is 0.002. Qualitatively speaking, a low probability (for example, below the usual 0.05 scientific confidence level) supports the conclusion that bias (possibly unintentional), rather than chance alone, influenced EPA's analysis consistently in the direction of underestimating PCB risks in the baseline HRA for the Hudson River.

### Significance for Health Risk Assessment

The findings reported above suggest that potential inhalation risks that should have been quantified in the EPA's HRA were not quantified. The EPA's HRA states the following:

Risks and hazards through inhalation of volatilized PCBs were not assessed in the Mid-Hudson HHRA because calculated risks for this pathway were shown to be *de minimis* (insignificant) in the Human Health Risk Assessment for the Upper Hudson River. Given that concentrations of PCBs found in the sediment and river water in the Mid-Hudson are lower than concentrations in the Upper Hudson, the risks from volatilization also would be expected to be insignificant (and



lower) in the Mid-Hudson. (US Environmental Protection Agency, 1999, p. ES-2)

This means that EPA's estimate of airborne PCB concentrations is below the New York State Department of Environmental Conservation *de minimis* Annual Guideline Concentration (New York State Department of Environmental Conservation, 1997, 2003) which, if exceeded, would trigger a requirement to quantify inhalation risks potentially posed by airborne PCBs under a reasonable worst-case scenario. Accordingly, although the HRA "considered" airborne PCBs, risks to public health potentially posed by transfer of PCBs from Hudson River water to the air effectively were assessed as zero. Risks posed by PCBs entering the air from cooling towers (with or without dredging) were neither quantified nor considered. Other sources of airborne PCB risks that also were unquantified, according to EPA's HRA, were "the contribution of PCBs in air from contaminated sediment and floodplain soil" (US Environmental Protection Agency, 1999, Section 2.3.4, p. 20).

### Regulatory Significance

If EPA had accepted empirical measurements of PCB transfer from water to air, potential risks to people inhaling PCBs would have been required to be included in its HRA (Table 3). Even the lowest of the five empirical measurements of airborne PCB concentration generated by PCBs at specified concentrations in water (0.03 ug/M<sup>3</sup>) exceeded the New York State Department of Environmental Conservation's published Annual Guideline Concentration value for airborne PCBs of 0.002 ug/M<sup>3</sup> by a factor of 15-fold. The EPA's use of the mean (0.15 ug/M<sup>3</sup>) or the median (0.09 ug/M<sup>3</sup>) of all five empirically measured airborne PCB concentrations would, of course, exceed these critical benchmarks even more dramatically. Most notably, the measured range of airborne PCB concentrations (0.033 to 0.53 ug/M<sup>3</sup>) reported by EPA exceeded by a factor of five-fold the New York State Department of Environmental Conservation's *de minimis* value of 0.1 ug/M<sup>3</sup> that would have triggered inclusion of PCB inhalation as an exposure pathway to be quantified in the HRA. The EPA's procedures, therefore, undermined public health protection by eroding safety and/or the margin of safety that should be built into EPA standards of public health protection.

The EPA understatement of PCB release to air affects other projects besides the Hudson River dredging project. The New York State Department of Environmental Conservation, for example, need not account for PCB emissions

from cooling towers in approving permit applications for projects (such as power plants), even if those projects will use cooling towers. Indeed, citizen criticism of EPA's Environmental Impact Statement value in the New York State Department of Environmental Conservation's permit review of project proposals has been rejected, not on technical grounds, but because the EPA values previously had undergone peer review. As a result, HRAs prepared by project applicants may 'account' for public health risks potentially posed by waterborne PCBs becoming airborne simply by quantifying them as zero, based upon the erroneous and apparently unreviewable assumption that PCB emissions from water to air will be *de minimis*. The potential significance is exemplified by the permit proceedings for the Bethlehem Energy Center gas-fired power plant on the Hudson River (Oko and Oko, 2001; PSEG Power New York, 2001), in which the applicant was exempted from quantifying risks potentially posed by airborne PCBs on the authority of the EPA's HRA for the Mid-Hudson River (US Environmental Protection Agency, 1999, 2000a, 2000b).

### Significance to Hudson River Communities

The most valuable reward for doing river restoration projects is that a river is in some sense "fixed." Although this reward would have to be especially large for the Hudson River to justify the enormous price of "fixing" it, the reality seems different. Whereas sediments and water should be cleaned, EPA's dredging program cleans only PCB hotspots, leaving PCBs in sediments, biota, and water elsewhere in the river, and also leaving virtually all non-PCB contaminants in sediments, biota, and water, even after dredging is completed. Indeed, EPA's dredging proposal addresses 150,000 pounds (68,000 kg) of sediment-borne PCBs compared with 1.3 million pounds (591,000 kg) that GE concedes it discharged into the Hudson from two capacitor plants. That amounts to less than 12% of known PCBs and an even smaller fraction of the total PCBs discharged into the Hudson River.

Whereas sport fisheries should be uncontaminated and game fish caught in the river safe to consume, in fact the fish cannot become edible in the reasonably foreseeable future. Even if every PCB molecule could be removed from the river, all other Hudson River pollutants will survive PCB hotspot dredging, including persistent chlorinated hydrocarbon pesticides, polycyclic aromatic hydrocarbons (PAHs), and heavy metals such as cadmium, copper, lead, mercury, and zinc (New York State Department of Environmental Conservation, 2000). Whereas air pollution aris-

ing from river water should become *de minimis*, in fact, mobilization of PCBs by dredging will increase PCB release to the air for years, and other pollutants also will become airborne after dredging is completed. Whereas the incidence of adverse health effects that might be caused by airborne PCBs should become *de minimis*, in fact, such health effects (if really caused by PCBs) might increase for years before they begin to diminish after dredging.

With or without dredging, purging PCBs from Hudson River sediments will require decades (Baker et al., 2001). At one extreme, the remaining PCBs might amount to only the 150,000 pounds to be dredged. In that case, about 90% already has been eliminated without dredging, and the river has cleansed itself of a major fraction of PCBs via processes that are ongoing; further self-cleansing would be expected. Realistically, cleansing has eliminated less than 90%, and multiples of 150,000 pounds must remain. In that case, if dredging occurs, a preponderance of PCBs still would remain after 150,000 pounds is removed. Ultimately, the Hudson River must cleanse itself, with or without dredging.

Some people see light at the end of the tunnel, when dredging will reduce PCBs in sediment, biota, water, and air, and reduce PCB-associated human disease to *de minimis* incidence. Others see light at the end of a different, longer tunnel, when continued natural burial by sediment loading from runoff into the river likewise will sever the connection of sediment-borne PCBs to the water, biota, and air, reducing PCB-associated human disease to *de minimis* incidence. Continued natural dechlorination of buried PCBs and further degradation via physical, chemical, and biological processes acting beneath the sediments eventually will finish the job, with or without dredging.

The dredging argument has focused narrowly on the two tunnels described above leading to *de minimis* PCB levels and whether shortening one via dredging is justified despite near-term environmental disruption. Even objective scientists cannot resolve subjective issues associated with deciding which tunnel constitutes the better route to essentially the same destination. Objective science, however, remains essential. Given the evident biases identified in this article's "Findings," objective consideration of at least three issue areas is needed:

1. Are PCBs harming health and, if so, are effects sufficiently serious, and risks sufficiently high, to justify urgent PCB removal?

2. If PCBs are harming human health in Hudson River communities, will dredging exacerbate harm by further mobilizing sediment-borne PCBs? If PCB-mediated health effects are unacceptable now, will their prolonged exacerbation by dredging be more unacceptable? Additional measures to protect populations would have to be contemplated—short of evacuation, but expensive. Conversely, if PCB health risks are acceptable, why dredge to remove PCBs when natural processes eventually will remove them anyway?
3. If the benefits of eliminating PCBs from hotspots are deemed worth the enormous price in a hypothetical, otherwise clean Hudson River, are they also worth the price in the actual Hudson River, which has pollutants other than PCBs, and PCBs in places other than in the hotspots where dredging will occur? Lost in the dredging debate seems to be the big picture: a dredged river polluted as before, but with at best a 12% decrease in PCB in its sediments. Is narrowly focusing on dredging hotspot PCB justified, if the river will remain toxic with other pollutants and with non-hotspot PCBs?

In light of these questions, the near-term price of dredging must include potential ecological and public health impacts. The findings and considerations addressed above justify three specific conclusions and one general conclusion. First, risks to public health potentially posed by inhalation of PCBs were not modeled correctly (effectively quantified as zero) and therefore would be ignored in a dredging-specific HRA if only the baseline HRA exposure routes and pathways are included for comparison. Second, even if all PCBs could be removed from the river or from hotspots, all other Hudson River pollutants would remain. Their continued presence after dredging would continue to limit recreational and commercial river use for many decades; for example, they still would limit consumption of fish, especially in pregnant women, young children, and other sensitive subpopulations. Third, PCB inhalation risks and their acceptability were unassessed and remain unknown, as is the degree to which dredging would exacerbate them and for how long. Finally, EPA's ultimate decision to dredge or not dredge will depend upon subjective issues whose resolution must be informed by objective science to answer the above questions, and others, credibly.

## Note

1. One of us (Michaels) previously consulted to GE under the auspices of RAM TRAC Corporation, but neither Michaels nor RAM TRAC has done

so for over five years. Neither author nor corporation has a business relationship with GE or financial interest in the dredging issue.

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## **Appendix 2**

**Michaels, Robert A.; and Uriel M. Oko.** *Hudson River PCB Dredging: midcourse assessment and implications regarding possible project continuation.* Environmental Practice (Cambridge University Press), 9:377-94, 2010

## Hudson River PCB Dredging: Midcourse Assessment and Implications Regarding Possible Project Continuation Versus Termination

Robert A. Michaels, Uriel M. Oko

Phase 1 of Hudson River dredging fractionally reduced the amount of polychlorinated biphenyl (PCB)-contaminated sediment remaining in the river bottom, but greatly increased its downstream transport, as “clamshell” dredge buckets leaked more material than they retained. Clamshells were especially inefficient at capturing liquid PCBs and PCBs adsorbed to silt and fine sediment. Material that was removed, therefore, was relatively coarse, and contained relatively little PCB. Volume reduction was achieved only at the expense of massive mobilization of liquid, colloidal, and adsorbed forms of PCB, spreading contamination to previously uncontaminated river areas. We estimate that Phase 1 increased the surface area of contaminated riverbed by at least 3 orders of magnitude, from about 50 dredged acres to many square miles. PCB entry into ecosystems, water, and air depends upon the surface area of contaminated sediment newly exposed to scouring from the riverbed, causing further downstream transport, especially in high-flow events over years or decades. Indeed, Phase 1 contravened EPA’s benefit criterion by mobilizing PCB at a higher rate than would occur naturally, without dredging, over the planned seven-year project duration. If dredging is to continue, therefore, Phase 2 must assure health risk acceptability and net benefit compared with no action/no dredging. Further, EPA’s benefit criterion must be revised to account for impacts of PCB mobilization to ecosystems and air, not just resuspension to water. Finally, Phase 2 must

increase the scope and duration of environmental monitoring to enable more reliable warning of harm in real time, and project evaluation over decades. We recommend that EPA consider for Phase 2 such technologies as coffer damming, vacuum dredging, and dredging within enclosures to minimize sediment resuspension; mobilization of liquid, colloidal, and adsorbed forms of PCB; and PCB entry into ecosystems and air. If Phase 2 cannot assure health risk acceptability and comply with a revised benefit criterion, we recommend that EPA terminate the dredging project.

*Environmental Practice* 12:377–394 (2010)

The General Electric Company (GE) has completed Phase 1 of United States Environmental Protection Agency (US EPA)-mandated dredging of polychlorinated biphenyls (PCBs) from 27 selected *hotspots* along a 40-mile stretch of the Hudson River, starting near Fort Edward, New York (GE, 2010a,b; US EPA, 2010a). The project, which may constitute the largest remedial action in the history of the Superfund Act of 1976 [Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)], is divided into two phases. It is to be implemented over seven years, with a cost estimated at nearly a billion US dollars. Phase 1 was started and completed in 2009 (year 1), though its objectives remain uncompleted. Year 2 (2010) is being spent evaluating Phase 1 and planning Phase 2, which encompasses a projected five-year period.

All parties agree that Phase 1 mobilized much PCB, significantly more than planned (GE, 2010a,b; US EPA, 2010a). PCB mobilization results in entry of mobilized PCB into ecosystems and environmental media, including the atmosphere, with consequential human exposure via all major routes: inhalation, ingestion, and dermal. Airborne PCB,

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like waterborne PCB, also may enter ecosystems (e.g., Buckley and Tofflemire, 1983). Planning for dredging Phase 2, therefore, must be informed by the reemerging issue of PCB toxicity to humans and other species.

Toxic effects exerted by PCB have been documented most extensively in animal studies, with probable significance for people. However, PCB effects on people also have been studied extensively [e.g., see Agency for Toxic Substances and Disease Registry (ATSDR), 2000; Baibergenova et al., 2003; Bertazzi et al., 1987; Carpenter, 1998, 2005; Carpenter et al., 2003, Chase et al., 1982; Choi et al., 2003; Colombi et al., 1982; Emmett, 1985; Emmett et al., 1988a,b; Fischbein, 1985; Fischbein and Wolff, 1987; Fischbein et al., 1979, 1982, 1985; Hennig et al., 2002; Kimbrough, Doemland, and LeVois, 1999a,b; Lawton, Ross, and Feingold, 1986; Lawton et al., 1985a,b; Lucier, 1991, Maroni et al., 1981a,b; Meigs, Albom, and Kartin, 1954; Slim et al., 1999; Smith et al., 1982; Stehr-Green et al., 1986; Taylor, Stelma, and Lawrence, 1989], including many studies associated with adverse human health effects. Effects include higher incidence of low-birth-weight infants among residents of zip codes of PCB disposal sites (Baibergenova et al., 2003) and, more recently, higher hospitalization rates for coronary heart disease in zip codes with PCB contamination (Carpenter, 2005). PCBs are classified as animal carcinogens and as probable human carcinogens (ATSDR, 2000).

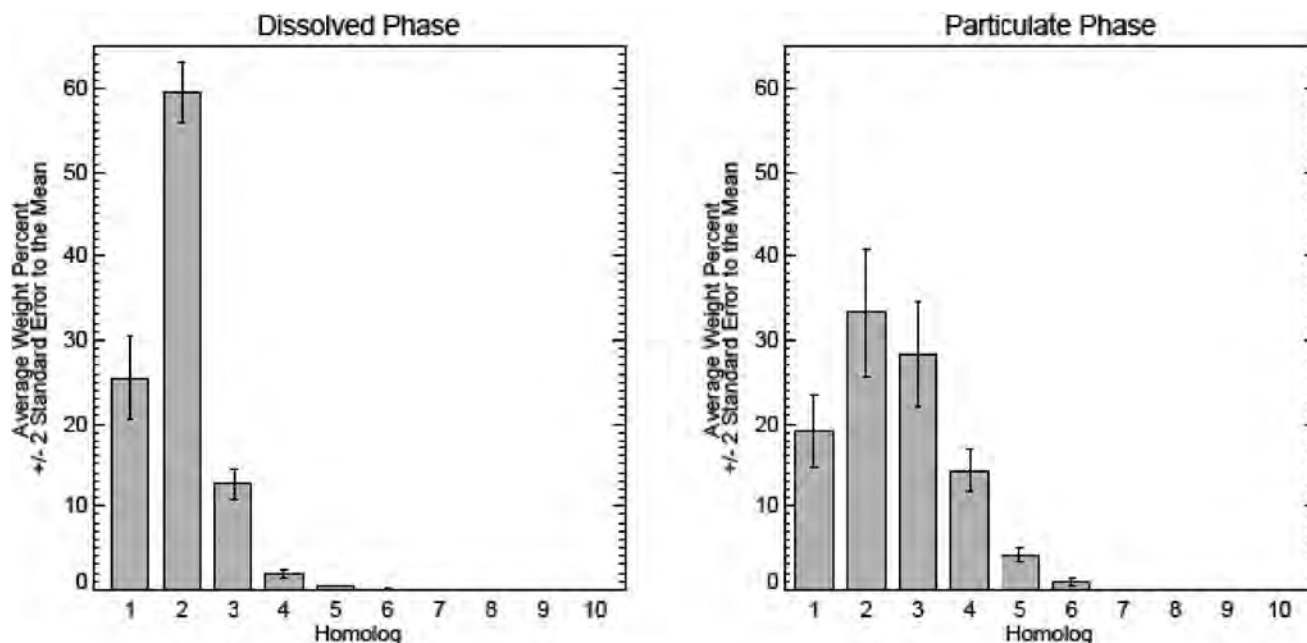
Occupational studies suggest that PCB inhalation adversely affects the human respiratory system (Emmett, 1985; Emmett et al., 1988a,b; Fischbein et al., 1979; Lawton, Ross, and Feingold, 1986; Smith et al., 1982; Warshaw et al., 1979), though such studies have been unable to exclude reliably causation by other occupational toxins to which simultaneous or sequential exposure might have occurred (ATSDR, 2000). Occupational studies also have suggested other adverse health effects of PCB, including gastrointestinal, hepatic, and dermal effects (Alvares et al., 1977; Baker et al., 1980; Bertazzi et al., 1987; Chase et al., 1982; Colombi et al., 1982; Emmett, 1985; Emmett et al., 1988a,b; Fischbein, 1985; Fischbein et al., 1979, 1982, 1985; Kimbrough, Doemland, and LeVois, 1999a,b; Lawton, Ross, and Feingold, 1986; Lawton et al., 1985a,b; Maroni et al., 1981a,b; Meigs, Albom, and Kartin, 1954; Ouw, Simpson, and Siyali, 1976; Smith et al., 1982; Warshaw et al., 1979). Accordingly, as part of planning for the dredging project, GE was required to adhere to EPA-approved limits on PCB concentration in air and water.

Our assessment of Phase 1 implementation of the Hudson River dredging project is informed by our findings that the project was justified by EPA based upon numerous errors,

all in the dredging-friendly direction, and our conclusion that these consistent errors amounted to pro-dredging bias on the part of EPA (Michaels and Oko, 2007). We evaluated EPA's baseline Hudson River health risk assessment (HRA) (US EPA, 1999, 2000a,b) and found it to be biased toward keeping PCBs in sediments that would be removed by dredging. The HRA did this by systematically misquantifying parameters, most essentially underestimating PCB movement from sediments to water and from water to air. EPA excluded from its analysis all monochlorinated and dichlorinated PCB congeners, which EPA subsequently estimated at about one third of total PCB mass in the river, and also excluded liquid PCB oils, dissolved and colloidal PCB, as well as PCB adsorbed to fine particles, such as clay and silt. GE Site Evaluation and Remediation Program Manager John G. Haggard on April 9, 2010, orally reported that half of the resuspended PCB in the dredging project was found to be dissolved; and half was in particulate form, which would include colloidal PCB. Consistent with this view, Paquin (2001) reported, "PCB in colloidal form constitutes the most mobile form of PCB in water, being affected only minimally by settling, physical retention or adsorption. Concentrations of PCB-like compounds in water can be much higher in colloidal form than in suspended solids or in dissolved form, and can be much more difficult to intercept through physico-chemical means" (p. 2). The dissolved and particulate phases of PCB measured in Hudson River dredging Phase 1 are quantified in Figure 5.3-14 of GE's *Phase 1 Evaluation Report* (Figure 1 here), which shows them to be roughly equal. GE's report states in the Key Findings section, "The PCB mass was mostly in dissolved form, although particulate phase PCBs were an important factor in resuspension" (GE, 2010b, p. 77).

EPA included silt-adsorbed PCB, but overestimated the rate at which it would settle out of the water column by inappropriately basing the settling rate on Stoke's law. Stoke's law applies to massive spherical particles that drop like marbles through a viscous medium. Flat clay particles settle more slowly with a longer path length and residence time than do spherical, or roughly spherical, particles. Dissolved and colloidal forms of PCB do not settle. None of these forms of PCB settle as Stoke's law would predict.

EPA's baseline HRA omitted electrostatic charges on clay particles that separate them, preventing agglomeration and maintaining clay in suspension; EPA also assumed that particles never "reflect" back into the water column after settling, likewise underestimating PCB concentrations in water (Shavit et al., 2003). Also omitted was PCB codistillation, in which PCBs at low bulk concentrations in river



**Figure 1.** Comparison of average composition for dissolved and particulate PCBs downstream of the Hudson River Phase 1 dredging area. Source: GE (2010b).

water preferentially distribute to the air-water interface, greatly accelerating PCB transfer from water to air (Harza, 1992; Integrated Atmospheric Deposition Network, 2000). EPA cited its own empirical data showing more rapid PCB water-to-air transfer (US EPA, 2000a,b) but, professing to disbelieve the empirical data, reduced the effect of these data on the HRA: EPA reduced the water-to-air transfer coefficient for PCBs by averaging in modeled PCB transfer coefficients that were orders of magnitude lower than the empirical findings because the modeled values ignored codistillation. Finally, EPA omitted PCB release into the atmosphere from hot water in cooling towers in communities along the Hudson River. Water at cooling-tower temperatures may release PCB into the air more than 10 times faster than rates determined from the surface of cold water and multiple orders of magnitude more rapidly than predicted by EPA's cold-river models.

Together, EPA's procedures reduced airborne PCB concentrations from above to below de minimis concentrations. This in turn eliminated the requirement (NYS DEC, 1997) for EPA's HRA [and other HRAs (such as PSEG, 2001)] to quantify inhalation risks posed by airborne PCBs. These HRAs, therefore, "considered" airborne PCBs, but erroneously attributed zero (de minimis) health risk to them.

Our assessment is appropriately conservative. In the context of error and the aforementioned pro-dredging bias for

the dredging decision-making process (US EPA, 2006), "conservative" means being careful to err on the side of agreement with EPA rather than on the side of exaggerating EPA's troubling methodological shortcomings and the consequences thereof (Michaels and Oko, 2007). Notwithstanding this troubling context, our assessment adopts two premises long advocated by EPA:

1. The scope of issues to be considered during the inter-phase period, *as defined by EPA*, explicitly excludes consideration of terminating the project and thereby abandoning Phase 2.
2. If dredging is to proceed to Phase 2, the manner in which it will be conducted minimally must assure conformity with EPA's criterion that net benefit must be achieved compared with no action/no dredging.

Three major issue areas most essentially are addressed in our assessment, and should be considered during the inter-phase period:

1. the possible need to modify dredging in Phase 2,
2. the possible need to modify the benefit criterion in Phase 2, and
3. the possible need to modify the monitoring program in Phase 2.



Our assessment addresses technical and policy issues within these three major issue areas.

## Methods

Our analysis is based upon activities including conducting site visits to observe and photograph dredging, visiting EPA's field office in Fort Edward, interviewing EPA and GE personnel and contractors, analyzing dredging data, attending public meetings, and examining scientific and technical reports. Our analysis adopts the methods of HRA, critical evaluation of scientific information sources (e.g., GE, 2009, 2010a–c; Gruendell et al., 1996; Michaels and Oko, 2007; United Nations Environment Programme, 2003; US EPA, 2010a–c) and objective scientific peer review. The latter are not a priori methods, and they are not described in detail here. Rather, they consist of the diverse methods that are generally typical of peer review by scientists seeking to remain objective. Most essentially, these methods consist of our own disciplined, critical evaluation of the scientific merit with which numerous methods were selected for use and applied prior to dredging, during dredging Phase 1, and after Phase 1. The scope of our assessment therefore includes our own peer review of GE and EPA methods, findings, and conclusions, such as those reported orally in public meetings, and in written public communications on GE (2010c) and EPA (2010b,c) Web sites for Hudson River dredging, and more formally in GE (2010a,b) and EPA (2010a) draft and final reports published for consideration by the public, specific interested parties, and members of the Hudson River dredging project's Peer Review Panel. Members of the public and other readers of our assessment can judge for themselves whether and to what degree we succeeded in applying the methods of HRA and of peer review objectively. We hope that we have done so completely.

## Findings

### Possible Need to Modify Dredging in Phase 2

#### *Mobilization of PCB-tainted sediment*

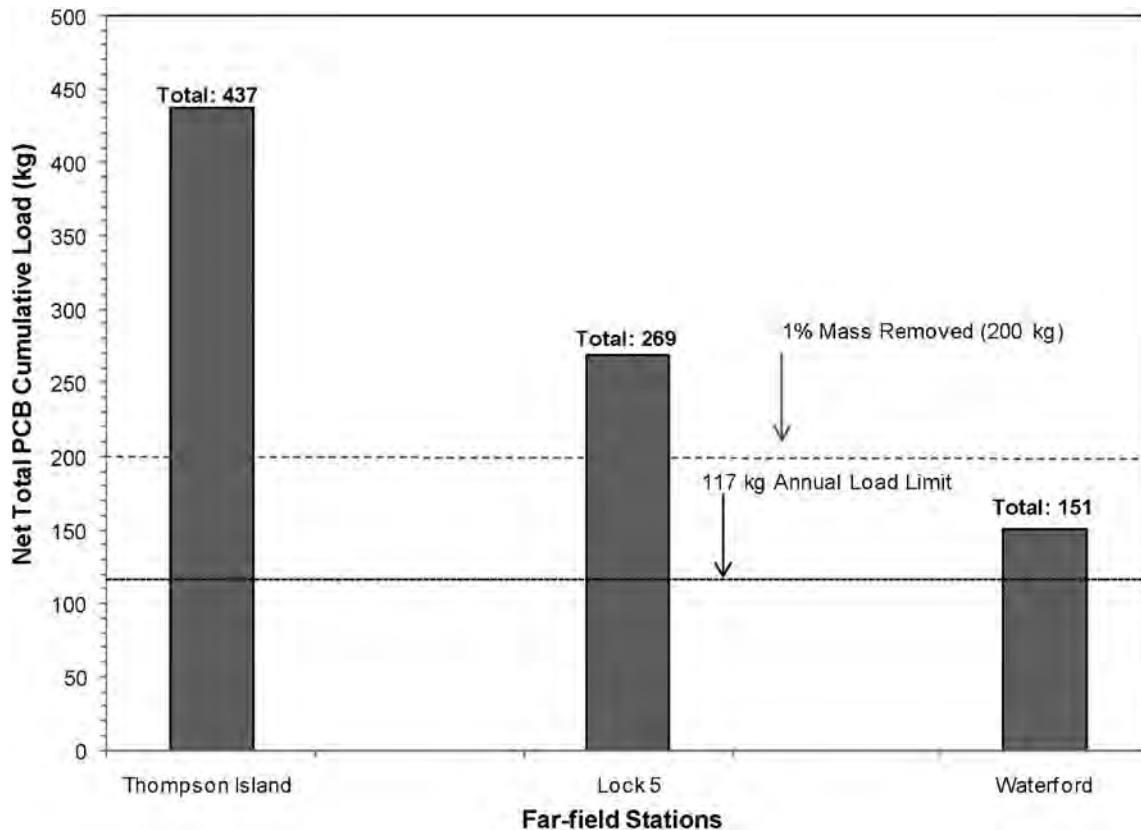
A major discrepancy exists between sediment mobilized in Phase I of GE's EPA-mandated Hudson River PCB dredging project versus the much smaller amount of sediment mobilization measured and reported by GE (2010a–c) and EPA (2010a–c). Sediment mobilization as reported by GE and EPA refers to the amount that is “resuspended” by

dredging, and monitored miles downstream of the Phase I dredging area, almost all of which is located near Roger's Island, some 7 miles from the monitoring station. As EPA has reported, however, most dredged sediment falls back to the river bottom in the trench or near the spot from which it was dredged initially. Thus, the preponderance of mobilized sediment remains on the river bottom, still mobile, but unrecorded in GE or EPA sediment mobilization data . . . hence the “sediment mobilization discrepancy.”

The *sediment mobilization discrepancy* represents more than merely a difference between a measured and an actual parameter value. Rather, it represents a fundamental inconsistency in EPA's past justification of the need to dredge versus EPA's current characterization of the performance of the dredging project in Phase 1. The need for dredging was justified by the mobility of sediments in PCB “hotspots” requiring, according to EPA, their removal by dredging. Indeed, a small but persistent trickle of buried PCB moving downstream was documented from PCB hotspots (e.g., see US EPA, 2006), of which 27 were selected for remediation via dredging.

In contrast, in the new context of actual dredging in Phase 1, EPA dramatically has altered its concept of mobility. *Mobility* in the dredging project is newly quantified by the lightest-weight fractions of PCB-tainted sediments measured resuspended *in the water* at the Thompson Island Dam about 7 miles downstream of the preponderance of Phase I dredging, further downstream at Lock 5, and still further downstream at Waterford [see US EPA's illustration (2010a), reprinted as Figure 2 here].

EPA's altered terminology, referring to mobilized sediment as sediment “loading” or “resuspension” estimates, confuses the issue. These parameters quantify only near-term mobilization and ignore the reality that all of the sediment that falls back to the riverbed also is “mobilized,” in the original sense of that term as used by EPA to justify dredging. That is, it is mobilized because it can enter riverine ecosystems and can reenter the water column via physical, chemical, and biological processes. Examples include, respectively, scouring under turbulent high-flow river conditions, dissolution, and microbial metabolism. Mobilized sediment also can be transported by migrating organisms, such as fish and birds, and can enter the air in communities directly from river water or from heated sources (cooling towers; Michaels and Oko, 2007) used to control industrial processes, such as in factories and power plants.



**Figure 2.** Resuspension of sediment particles bearing trichlorinated to decachlorinated PCB measured at three stations miles downstream of Phase 1 dredging. Source: US EPA (2010a).

### Quantifying mobilization of PCB-tainted sediment

We initially estimated that 80% of sediment disrupted by dredging was mobilized rather than transferred to barges. This estimate was based upon the size, shape, and operation of typical 5-cubic-yard dredge buckets that open to a width of 15 feet; that is, enclosing 15 feet of river bottom to a design depth of about 1.5 feet, and then close to a width that we visually estimate at about 3 feet (zero feet at the bottom, wider higher up). We observed that, as the buckets close, they compress their contents, squeezing inward and upward about 12/15ths (80%) of the sediments that were initially enclosed within their jaws.

These buckets also were found to leak excessively because of obstructions in the river bottom that prevent their complete closure (Figure 3). Obstructions preventing bucket closure include stones, automobile tires, tree branches, bottles and cans, and construction debris such as concrete and boards. During closure, enclosed sediments are compressed from an open-jaw width of about 15 feet to a

closed-jaw width of zero feet at the bottom (maybe about 3 feet in average width from the bottom nose of the bucket to the top of its sediment load). As dredge buckets are open at the top, this “squishing” forces out a slurry of sediment and water. Leakage of incompletely closed buckets drops material onto the river surface (Figure 4). Our 80% mobilization estimate was approximate at best, in part because not all buckets were of 5-cubic-yard capacity (see Table 1, the inventory of dredge buckets used in Phase 1).

We now have quantified the mobilization parameter more reliably by using GE’s “bucket files” (GE, 2010a). GE’s *bucket files* are computer registers recording each closure of a dredge bucket in each delineated 5-acre work unit [Certification Unit (CU)]. The Phase I dredging area consisted of 18 CUs and about 90 acres, but dredging actually occurred at just 10 CUs, or about 50 acres. Analysis of these GE files revealed that the preponderance of sediment disturbed by dredge buckets was left in mobile form on the river bottom, not placed in waiting barges. We related the number



**Figure 3.** Dredge buckets should close completely before lifting their sediment load, but they leak excessively because obstructions prevent complete closure. Hudson River dredging site, July 28, 2009.

of bucket closures in each CU to separately reported information about the volume of sediment placed in barges in each CU. This analysis is summarized in Table 2, in which all bucket closures in all CUs are summed.

As Table 2 indicates, the preponderance of dredged material was not barged, but mobilized. The exact fraction mobilized depends upon the capacity of the dredge buckets that were used. The dredge bucket capacity in turn depends upon the maximum capacity of each bucket and the depth of its bite into the sediment, both of which were variable because three bucket sizes were used (Table 1), and sometimes they did not penetrate to their full design depth; for example, if they struck a boulder or construction debris. The standard bucket capacity was 5 cubic yards with a design penetration depth of 18 inches. The five 5-cubic-

yard buckets were used routinely, notwithstanding that more 1-cubic-yard buckets (seven) were available for standby use in sensitive spots, especially near shore. The project also had one 2-cubic-yard bucket (Table 1). We further assume that the design penetration depth was typically the target depth, so the overall average bucket capacity probably was close to 5 cubic yards.

As Table 2 shows, Phase I dredging pulled out 286,006 cubic yards of sediment (actually a slurry of sediment and river water), which went into barges (topped by a layer of water). The dredge buckets closed 221,521 times, producing an average load of 1.29 cubic yards per bucket load that was transferred to waiting barges (including the water). The amount of sediment to be rail-shipped to Texas is less, because sediments must be dried before loading. Even using



**Figure 4.** Dredge closure forces a slurry of sediment and water upward through the open top of the bucket, and leakage of incompletely closed buckets drops material onto the river surface. Hudson River dredging site, July 28, 2009.

**Table 1.** Summary of bucket volume, by dredge

Dredge name	Dredge type	Bucket volume (cubic yards)
320-09	320	1
320-10	320	1
320-11	320	1
320-12	320	1
320-13	320	1
320-14	320	1
320-16	320	1
345-07	345	2
385-02	385	5
385-03	385	5
385-04	385	5
385-05	385	5
385-06	385	5

Source: General Electric (2010a,b, Appendix N, Table N-1).

the larger figure as the estimate of barged “sediment,” however, the amount barged still is only 26% of an assumed 5-cubic-yard average bucket capacity, or 32% of a 4-cubic-yard capacity, or 43% of a 3-cubic-yard capacity.

That means that the amount of sediment that was mobilized was 74% if the average bucket capacity is assumed to be 5 cubic yards, 68% if 4 cubic yards, and 57% if 3 cubic yards. Under any of these assumptions, the preponderance of material was mobilized, not barged, and still more was

**Table 2.** Sediment retention vs. mobilization in Phase 1 of Hudson River polychlorinated biphenyl (PCB) dredging, based upon automated recording of dredge bucket closures<sup>a</sup>

221,521	Number of dredge bucket closures <sup>b</sup>
286,006	Volume of sediment removed, transferred to barges [cubic yards (yd <sup>3</sup> )]
1.29	Volume of sediment removed per bucket closure (yd <sup>3</sup> /bucket load)
	<i>Sediment load retained in bucket vs. mobilized . . .<sup>c</sup></i>
	<i>. . . assuming average bucket capacity = 5 yd<sup>3</sup></i>
25.8	Percent retained and barged
74.2	Percent mobilized
	<i>. . . assuming average bucket capacity = 4 yd<sup>3</sup></i>
32.3	Percent retained and barged
67.7	Percent mobilized
	<i>. . . assuming average bucket capacity = 3 yd<sup>3</sup></i>
43.0	Percent retained and barged
57.0	Percent mobilized

<sup>a</sup> Additional sediment was mobilized when buckets impacted the river bottom but failed to close; these *bucket rejection* events were unrecorded. Mobilized sediment may be removed by future dredging if it falls back to the bottom at a location that is within a dredging *prism*.

<sup>b</sup> Data acceptance criterion: depth is below 119-foot elevation.

<sup>c</sup> Bucket capacity is 5, 2, or 1 yd<sup>3</sup>; design penetration depth is 18 inches for a 5-yd<sup>3</sup> bucket.

Source: Tabulated values represent results of our analysis of General Electric (2010b) Phase 1 dredging project data, most notably GE’s bucket files (Appendix G, Table G-1).

mobilized when dredge buckets descended to the river bottom, but failed to close (termed *bucket rejection*). Some of the mobilized sediment, however, might have been dredged again, and a further fraction removed from the river, if the sediment fell back to the river bottom within a “prism” slated for future dredging.

We regard our best sediment mobilization estimate as 74% for the 5-cubic-yard-capacity bucket typically used. That estimate is a minimum, as it excludes sediment that is disrupted by dredge buckets when they crash to the bottom but fail to close because of obstructions such as boulders or construction debris. These factors bring the mobilization fraction closer to our initial, independent estimate of 80%, though we can quantify reliably only the 74% minimum estimate, which therefore is only approximate if viewed as a total mobilization fraction.

The mobilized fraction of sediment, therefore, conservatively amounts to about 1,100,000 cubic yards, which is approximately 3.7 million metric tons (tonnes), assuming a dredged sediment specific gravity of about 2.6 compared with water (Gruendell et al., 1996).<sup>1</sup> Yet, EPA’s illustration

(Figure 1) reports 437 kg resuspended sediment load at Thompson Island, 269 kg at Lock 5, and 151 kg at Waterford. Ignoring obvious double counting, EPA reports 857 kg of mobilized “resuspended” sediment, which is drastically less than 744 million kg. Thus, EPA’s figures exclude nearly all mobilized sediment. EPA simply has ignored the preponderance of sediment mobilization, and PCB mobilization, in evaluating the performance of the dredging project in Phase 1, notwithstanding that the persistent mobility of dissolved, colloidal, and fine-particle-adsorbed PCB originally constituted for EPA a central rationale for specifying the dredging remedy for the Hudson River PCB Superfund site.

### *Downstream PCB deposition*

PCB in dredged, redeposited sediments is more mobile than was the case in the original buried state, which ironically is the physical state that EPA’s strategy of capping dredge prisms has sought to restore. From the river bottom, resting sediment piles produced by Phase I dredging gradually (perhaps over years) can and will erode. Some sediment will travel downstream, to be measured by GE in the EPA-mandated “resuspension” monitoring program. Indeed, on March 28, 2010, recently analyzed Hudson River water samples were reported to harbor PCB levels nearly five times higher than the federal drinking-water standard of 500 parts per trillion (ppt). This news reasonably could have been anticipated. The episode was reported to have been caused by scouring of PCB-tainted sediments from the river bottom during a “high flow” event, in which river flow past Thompson Island increased from 5,000 cubic feet per second (CFS) to a peak of 36,000 CFS (e.g., see US EPA, 2010b,c).

We also note two Key Findings in GE’s *Phase 1 Evaluation Report* (2010b, p. 77):

- Dredging activities caused previously buried PCB-containing sediments to migrate downstream and settle on the surface of the river bottom, where they became bioavailable. PCB concentrations in downstream sediment traps ranged from approximately 24 to 126 mg/kg Total PCBs, with an average of 61 mg/kg, and downstream sediment cores of previously sampled areas showed an average increase of three times pre-dredging concentrations. *These and other lines of evidence show that dredging caused widespread redistribution of PCB-containing sediments on the surface of the river bottom.*

- *These re-deposited sediments continued to release PCBs to the river well after the completion of dredging activities [emphasis added].*

Demonstrably, as already shown, residual sediments disturbed by dredging are mobile, along with their PCB load. If a full dredge bucket averages 5 cubic yards, then just about a quarter of dredged sediment was transferred to barges. Some of the remainder must flow downstream with the current. The rest falls back to the river bottom, where it exists as loosely agglomerated piles of dredge spoils, including clay and mud. River currents, as illustrated by the high-flow event previously described, erode this material gradually back into the water column, from which PCBs may enter the air and ecosystems, including migrating fish and birds.

As the river again slows to its normal flow rate, some scoured, resuspended PCB-tainted sediment will settle (redeposit) downstream. As EPA’s illustration shows (Figure 2), the amount of resuspended sediment diminishes from upstream to downstream, documenting (and roughly quantifying) redeposition (roughly, as dilution also must have contributed to the decrease).

### *Significance of downstream deposition*

Downstream deposition of river sediment involves a wide spectrum of particle sizes. *Clamshell dredges* preferentially capture the coarse particles: sand and rocks that have relatively little surface area. In other words, clamshell dredges preferentially leave behind relatively small particles, having the greatest surface area, on which the greatest amount of PCB is adsorbed. Dredges preferentially capture the relatively small fraction of the PCBs that are adsorbed on sand and rocks. To illustrate, consider PCB adsorption to carbon (McDonough, Fairey, and Lowry, 2008). PCB affinity for carbon is high, on average about 500 ng/m<sup>2</sup>, which reasonably might be expected also to approximate PCB affinity for Hudson River rocks and smaller particles, such as clay and mud.

If the carbon is formed into a cube, its surface area is six times the face of the cube. If the cube then is divided into finer cubes, the total surface area increases, as does PCB adsorption onto the smaller cubes. A cubic particle with a 0.01-cm side presents a surface area of 0.0006 cm<sup>2</sup> for adsorption, whereas the same amount of particulate matter divided into 1,000 smaller particles, each with a 0.0001-cm (1 mm) side, presents an aggregate surface area of 0.6 cm<sup>2</sup>, 1,000 times greater. That is still a coarse particle. If the

cube, however, is subdivided finely enough (say, to the micrometer range), its surface area becomes so large that the material acquires a new name based upon its propensity to adsorb substances such as PCBs: *activated carbon*, or *activated charcoal*. Gram for gram, fine or ultrafine Hudson River particles in the size range that is preferentially mobilized by dredging can and will adsorb PCBs in amounts that are millions of times higher than adsorption onto coarse particles, just as activated carbon adsorbs PCBs more efficiently than does a coarse block of carbon.

Upon closure of *clamshells*, these fine, PCB-laden particles preferentially leak into the water column, which carries many of them downstream. These particulates eventually settle. Repeated action of the dredges causes this moving front to become increasingly concentrated with PCBs.

Clamshell buckets, as already described, tend to exert not only a mobilizing effect on sediment, but also a particle resorting (or *classification*) effect, which constitutes one burden of PCB dredging. Moving the pontoon-mounted dredge platform and clamshell downstream effectively constitutes chasing a moving, increasingly concentrated PCB front to previously uncontaminated river areas. Depending on water-flow velocity, this can be a few hundred feet or many miles downstream of the dredge.

Perhaps the dredge type that is most damaging to the environment is pontoon-mounted backhoe/excavator dredges, of the type used in Phase I. Underwater bucket closure compresses the contents, forcing much water and sediment out of the open top of the dredge bucket, preferentially dispersing relatively fine particulates into the flowing water column (Figure 4). These relatively small particulates are slowest to settle and most susceptible to downstream migration. To prevent such migration, other types of dredges could be used. Those that suck up the bottom sediment with water to be discharged into hoppers for sedimentation and/or treatment might be most effective. The process of dredging-induced gradual sediment resuspension followed by downstream flow and redeposition illustrates that, most essentially, four insidious processes are under way:

1. PCB spreading,
2. PCB entry into Hudson River ecosystems,
3. PCB resuspension increase in high-flow events, and
4. PCB storage increase in Hudson River ecosystems.

*PCB spreading.* One insidious process is spreading of PCB from sectors of the river bottom dredged in Phase 1 to undredged sectors downstream. In the long term, PCB movement from sediments to river water, ecosystems, and air depends upon the *surface area* of contaminated river bottom, not on the *volume* of buried (nearly all immobile) PCB . . . and the area of river bottom that is contaminated is increasing due to dredging. Dredging in Phase 1 was intensively concentrated in a relatively small area (somewhat over half of the full 90 acres included in Phase 1), so dredging affected a high fraction of the river bottom in the Phase 1 area. This cannot be the case in Phase 2. Most of the river bottom on which resuspended PCB-tainted sediments will settle is not scheduled for dredging in Phase 2. As a result, PCB will continue to spread and redeposit over a gradually increasing area of river bottom, nearly all of which is not scheduled for dredging, ever.

*PCB entry into Hudson River ecosystems.* As the area of river bottom affected by redeposition of mobilized PCB-tainted sediments increases, PCB will enter river ecosystems beyond the Phase 1 area. These will include detritus ecosystems and ecosystems involving the higher trophic levels, from primary producers (phytoplankton and rooted plants) to herbivores (such as carp), primary carnivores (zooplankton and some fish), and secondary and tertiary carnivores (including some large fish, amphibians, reptiles, and mammals).

Already, GE and EPA have reported fivefold increases in PCB concentrations in fish tissue (GE, 2010b; US EPA, 2010a), but these bioconcentration data represent a misleading underestimate of the degree of increase. The data reflect analysis of muscle tissue of fish (filets), whereas PCB levels in organs (especially fish liver) may be 2–3 orders of magnitude higher. Some people, especially American Indians, consume fish organ meats. Fish also are consumed in their entirety by microbes and by predators other than humans. Thus, the PCB load entering Hudson River ecosystems from dredging is grossly underestimated by data on PCB concentrations in fish filets.

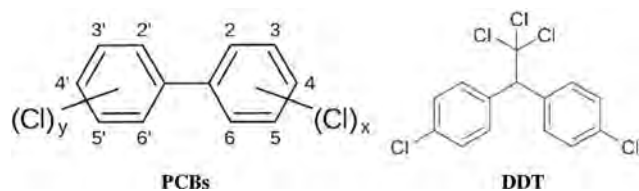
*PCB resuspension increase in high-flow events.* As the area of river bottom affected by downstream movement of mobilized PCB increases, the effectiveness of increased river flow at suspending redeposited PCB-tainted sediment will increase, even if the scouring efficiency remains constant for any particular current speed. This is because the scouring efficiency, whatever it is quantitatively, will affect a larger area of the river bottom. In ad-

dition, the scouring efficiency may increase for any given river flow rate because relatively low-mass particles will be the ones preferentially transported downriver from the Phase 1 area. This also suggests that the duration of river flow-induced exceedances of the 500-ppt federal drinking-water standard for PCB may increase, as the fraction of river bottom contributing to the exceedances increases. Monitoring data (US EPA, 2010b,c) suggest that such high-flow events may occur with a frequency in the range of once to 10 times per year.

#### *PCB storage increase in Hudson River ecosystems.*

The aforementioned processes can be expected to alter the distribution of PCB originally confined to 27 hotspots slated for dredging to a wider, and widening, river sector. This sector will continue to expand and, along with it, the fraction of Hudson River ecosystem area affected by PCB will increase. These riverine ecosystems will relate to mobilized PCB-tainted sediments originating from dredged hotspots as a pollutant source to a pollutant sink.

This phenomenon was documented (for example, by Carson, 1962) in a famous case study involving the chlorinated pesticide DDT, which closely resembles PCB both structurally and dynamically (though PCB is somewhat more water-soluble and less long-lived in ecosystems). The uses of DDT and PCB differ, but dissemination of DDT (and its breakdown products DDE and DDD) to the environment of Clear Lake, California, to control midges (the Clear Lake “gnat”) is analogous to dissemination of PCB to the Hudson River. PCB and DDT for many decades have been disseminated to ecosystems globally, so much so that discerning their effects experimentally has been difficult for lack of unaffected control ecosystems. DDT and PCB, which have co-occurred in environmental samples for many decades, are similar structurally:



Indeed, their structures are so similar that, until the 1960s, only DDT was discerned analytically in environmental samples, resulting in ecological effects of DDT and PCB together being attributed solely to DDT. Structural analogues often exert similar toxic and environmental effects [termed *structure-activity relationships* (SARs)]. The possible consequences of spreading PCB more widely in the Hudson

River are worthy of considering in light of the Clear Lake (and global) experience with DDT. In Clear Lake, significant residues of DDT were not found, as DDT is nearly water-insoluble. This negative finding, however, proved to be misleading, as the biota of Clear Lake proved to be a major sink for DDT, which dramatically bioconcentrated, bioaccumulated, and biomagnified in its ecosystems.

By these processes, DDT (and related chlorinated hydrocarbons) exerted significant effects from which global ecosystems are just now recovering. For example, bald eagles and peregrine falcons were threatened with extinction because DDT thinned their eggshells, causing drastic population declines. Similarly, dredging-induced mobilization of PCB-tainted sediments reasonably may be expected to reintroduce PCB into receptive ecosystems, thereby setting back the clock for river recovery by four decades, during which PCB may be reburied as it was before being dredged this past year in Phase 1.

#### Possible Need to Modify the Benefit Criterion in Phase 2

##### *Contravention of the benefit criterion*

The EPA illustration reproduced earlier (Figure 2) documents contravention of the benefit criterion. GE and EPA used mid-Phase 1 data to attempt dredging modifications in real time to restore adherence to the benefit criterion. These efforts succeeded at reducing PCB resuspension, but not to a degree sufficient to restore adherence to the benefit criterion, as shown in Figure 2. These facts have been widely acknowledged (most notably, see GE, 2010b; US EPA, 2010a) and will not be amplified here.

##### *Flaws of the benefit criterion*

The *benefit criterion* allows no increase in downstream transport of resuspended sediment for the duration of the dredging project. Instead, under the benefit criterion, downstream transport may be increased by dredging in the short term, but only in amounts that will be offset by future decreases over the longer term, meaning the project duration. This benefit criterion is illogical for two reasons:

1. It assumes incorrectly that downstream transport of PCB-laden sediments will stop when dredging stops in six or seven years. This assumption has been refuted by the observed decades-long mobility of PCB, even when buried beneath the river bottom. Dredged sediment that is re-

deposited onto the river bottom likewise will erode into the water column and travel downstream, along with its adsorbed PCB load, for decades to come. The rate of erosion, however, will be significantly increased (with contaminated riverbed surface area) compared with the low rate that EPA used to justify dredging.

2. It assumes incorrectly that potential dredging impacts consist of nothing more than downstream transport of resuspended sediment, whereas this appears to constitute a relatively minor contributor to total potential dredging impacts, even when considered only during the restricted dredging period of five or six more years. Maintaining a stringent resuspension performance standard, even if it could be met, still allows harm from entry of PCB from tainted sediments deposited on the river bottom into river ecosystems, including migrating birds and fish, and into the air that is breathed by people living in river communities.

#### Possible Need to Modify the Monitoring Program in Phase 2

##### *Liquid PCB oils*

EPA reported at a public meeting in the Hudson River town of Fort Edward, New York, on August 19, 2009, that GE clamshell dredges had started to encounter liquid PCB oils in dredging prisms (see also GE, 2010b,c; US EPA, 2010a,b). This development is worthy of note because pure PCB oils [1,000,000 parts per million (ppm)] must be viewed in an entirely different, more ominous context than river sediments harboring PCBs in the low-ppm concentration range. Mobilizing liquid PCB oils via dredging is commensurately more serious than mobilizing sediments bearing PCBs in the low-ppm range as originally anticipated.

EPA later acknowledged [for a magazine article (Brickley, 2009)] that the project recently had discovered *sheens* of liquid PCB oil on the river surface, “an indication, the EPA said, that the river floor contained not only contaminated silt, but more potent pockets of pure PCB oil—and that the dredging is releasing the oil into the river water.” EPA, however, placed a relatively benign spin on this news: “It’s not really affecting dredging, that’s why we’ve taken those mitigation measures to, you know, to counteract the sheens.” Counteracting microscopically thin PCB sheens visible on the river surface, however, fails to address the real challenge: counteracting remnant pools of originally disposed liquid PCB oils of unknown, potentially large volume in trenches beneath.

PCB sheens on the river surface constitute evidence of the presence of liquid (near pure) PCB and constitute yet another source of airborne PCB not addressed in any EPA assessment of risks to health potentially posed by sediment dredging at PCB hotspots in the Hudson River. These PCB sheens cannot have originated from desorption from sediments, because a sheen is a continuous monomolecular layer of liquid PCB. Their observation, therefore, raises the question of whether they might be expected to arise from underlying sediments bearing PCBs in merely the ppm range, or whether they must originate from more massive pools of liquid PCB oils at the river bottom as originally suggested by EPA.

Can bottom sediments form surface sheens via some upward PCB migration process? Three factors suggest not:

1. PCBs chemically bound to sediments for decades are unlikely to become unbound, especially as liquid PCB oil;
2. if they did become unbound, they also would have to become concentrated from the low-ppm range at the river bottom to near purity at the surface, which is unlikely to occur in a flowing, turbulent river; and
3. PCB oils are denser than water, so they would be expected to sink, not to rise from the bottom, unless physically forced upward, or lifted; just a small fraction of more-water-soluble PCB congeners might reach saturation in the water, and may appear as a sheen on the river surface.

PCB liquids include more than 200 types, or *congeners*, varying in their degree and pattern of chlorination (with from 1 to 10 chlorine atoms per PCB molecule). Each congener has a unique density, but bulk density of commercial PCBs of the types disposed to the Hudson River (known as *Aroclors*, manufactured from approximately 1930 to 1979) are reported to have a density of about 1.5 grams per milliliter [g/ml (Gruendell et al., 1996)], which is 1.5 times the density of water.

The most probable origin of PCB liquids forming surface sheens, in our view and apparently also in EPA’s view (based upon oral statements), is that dredge buckets massively disrupt them from pools of liquid PCB oils formed in sediment low points (depressions) following original disposal from land-based facilities or ships. These bottom pools gradually might have become covered with debris and sediments. The onset of dredging may be forcing the liquids upward toward the surface as dredge jaws expose them and close around them. This process is visible for



sediments (which have tightly bound PCBs that would not be expected to form sheens) and reasonably would apply as well to liquid pools (which would be expected to form surface sheens).

Sediments and PCB oils that are not forced upward by closing dredge jaws might be retained within dredge buckets, and physically lifted. These materials would be subject to leakage during their ascent to the surface and beyond. These dual processes of disruption by squishing and by lifting reasonably would be expected to generate PCB liquids and PCB sheens at the surface, as PCBs are chemically attracted to surfaces, including to the air-water interface in rivers.

EPA's report of encountering PCB liquids seems, at least in retrospect, unsurprising given the history of past PCB disposal into the river in the form of liquid PCB oils from land-based facilities and from ships. Given this history, why did EPA adopt the clamshell method of dredging, thereby failing to prepare for this seemingly expectable eventuality? Its actuality casts further doubt on the wisdom of EPA having prescribed clamshell dredging rather than vacuum dredging, or no dredging, for remediation of the Hudson River PCB Superfund site.

One objection to the liquid-pool hypothesis that must be addressed is that PCB concentrations in downstream water samples have not revealed PCB oils or concentrations high enough to suggest their presence upstream. The heavier-than-water density of PCBs, however, would be expected to cause them to hug the river bottom as they move downstream. They would not be expected to register in surface or mid-depth water samples taken 5–7 miles downstream.

In planning dredging Phase 2, EPA (and GE) are faced with the quandary of whether to

1. mobilize PCB oils by continuing clamshell dredging, even though the dredge buckets cannot retain the oils efficiently,
2. allow the PCB oils to be mobilized by river currents washing over the now-exposed pools,
3. institute vacuum dredging or dredging within enclosures, or
4. stabilize the oils by covering them over again.

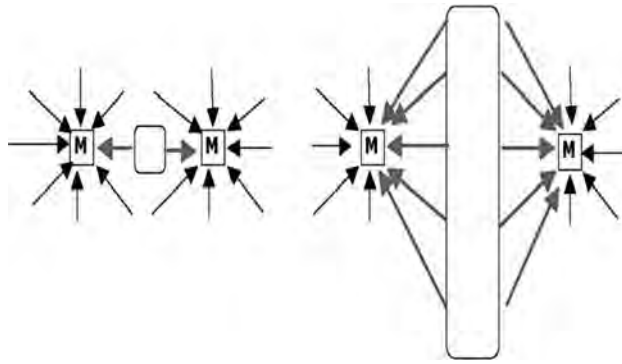
### *Monitoring for waterborne PCB*

Waterborne PCB in the Hudson River, including water in dredge buckets and barges, constitutes the primary source of airborne PCB. Indeed, EPA studied the relationship of waterborne PCB in a cold river to airborne PCB 1 m above the river surface (US EPA, 2000a,b). That study produced the EPA benchmark termed the *level of concern* (LOC) for airborne PCB of  $0.08 \mu\text{g}/\text{m}^3$ , which is the air level estimated to be generated by waterborne PCB at EPA's *maximum contaminant level* (MCL) for PCB of 500 ppt.<sup>2</sup> Generated primarily by dredging, waterborne PCB therefore should be measured where dredging occurs . . . but that was not done in Phase 1. Instead of sampling at Rogers Island, water was sampled, and waterborne PCB measured, near Thompson Island, about 7 miles downstream of Rogers Island. As a result, waterborne PCB concentrations at dredging sites are anyone's guess, specifically determined by anyone's guess about the applicable dilution factor that occurs as dredge-mobilized material travels 5–7 miles downstream.

### *Monitoring for airborne PCB*

Just as waterborne PCB concentrations at dredging locations are anyone's guess, airborne PCB concentrations at dredge sites also are anyone's guess, in part because airborne PCB monitoring at dredging platforms in Phase 1 consisted of personnel monitoring with sensitivity to the Occupational Safety and Health Administration's occupational standard of  $1,000 \mu\text{g}/\text{m}^3$  for airborne PCB (see the next section). Airborne PCB was monitored primarily by two portable air samplers set up adjacent to each dredge platform, on opposite banks of the river.

These samplers recorded 24-hour average concentrations of airborne PCB. Three problems undermined the usefulness of these monitors. First, personnel engaged in dredging are exposed to aerosols generated at the dredge platform, which reasonably would be expected to fall back to the river surface before reaching the monitors on shore, except when wind speed is adequate to transport them as far as the shore and when wind direction is aimed at a portable monitor. In those cases, of course, only one monitor would record the PCB, because the wind would be blowing away from the monitor on the opposite shore. Second, wind direction varies, so each air monitor would be pumping air that originated from  $360^\circ$ , not primarily from the direction of the dredge platform to which it is adjacent. This is illustrated in Figure 5, in which gray arrows represent air originating from the dredge platform, and the preponderance of black arrows represent air originating from other directions.



**Figure 5.** PCB entry into air was quantified in Phase 1 via portable on-shore monitors (M) placed on opposite shores adjacent to each dredge unit. *Gray arrows* represent air originating from the dredge platform; the preponderant *black arrows* represent air originating from all other directions. Only average airborne PCB concentrations therefore are recorded. Peak airborne PCB concentrations that may be sampled are not reported because they are mixed with air from originating from all directions over a 24-h period.

Figure 5 also illustrates how, as the dredge platform moves downstream, the angle from which PCB might impinge on the portable monitor increases. Thus, a time series should show increasing airborne PCB concentrations as the surface area of dredged river increases. This observation actually cannot be made, however, because GE procedures call for moving each portable air monitor downstream with its adjacent dredge platform, so no monitor remains to record evolving airborne PCB concentrations at any former dredge site. Indeed, as the area of dredged river surface increases to its maximum, the concentration of airborne monitors per acre of dredged river declines in direct proportion because no monitors are added to cover the increased area of dredged river.

This gives rise to the third problem: PCB volatilization might not reach a steady state until long after the portable air monitors are withdrawn downstream with the dredge platforms. Indeed, PCB release from the river surface might not reach steady-state rates until long after completion of Phase I. By then, portable monitors would have been withdrawn, not only to points downstream, but altogether. In short, the monitors are withdrawn before they can characterize the evolution of PCB release to the air over the remaining six-year planned life of the project and beyond.

Indeed, as the acreage of dredged river increases, the number of monitors per acre declines, but the fraction of river

surface contributing to air levels over the river and on shore increases . . . never to be measured because the monitors that could have measured these evolving levels were withdrawn from service. EPA could require a permanent array of air monitors to capture the evolution of PCB release levels as the fraction of river bottom that has been dredged increases and as PCB-tainted sediments are re-stratified by physical, chemical, and biological processes of degradation, mobilization, and eventual release to ecosystems and the atmosphere.

One strategy to rectify this egregious situation might be effective: examining meteorology data to determine the fraction of time when wind direction was toward a portable air sampler on shore. If the fraction of time was, say, 1%, then the airborne concentration from the point of origin (the dredge platform) would have been *at least* 100 times higher than the concentration reported by the sampling unit (we say “at least” because the sampling unit would not have recorded PCB-bearing aerosols that had precipitated back to the river surface before reaching shore). We do not know whether the required meteorology data are available.

#### *Personnel monitoring for exposure to airborne PCB*

A major concern associated with PCB dredging relates to risks potentially posed to human health (Michaels and Oko, 2007). Apart from participation of people as ecosystem components at the top of the food chain is the issue of airborne PCB, which is derived from PCB released to the water, and which is monitored only at great distance from dredge sites, as discussed earlier. To help elucidate this issue, EPA could demand delivery of the results of personal monitoring samples taken on dredge platforms, minus confidential employee-identifying information. These samples generated the only data of which we are aware that reflect airborne PCB levels produced by dredging, at the location of dredge platforms. These samplers, unfortunately, operated with sensitivity to the occupational airborne PCB limit of  $1,000 \mu\text{g}/\text{m}^3$ , which is over 9,000 times higher than EPA’s residential limit of  $11 \mu\text{g}/\text{m}^3$ . If any of these samples were positive, that fact should be disclosed. EPA, however, indicated that the personal monitoring data belong to GE, and GE indicated that the data belong to its contractors. Information of possibly critical concern to the public has been “compartmentalized” thereby, out of public view. Reason exists to demand these data, because some personnel monitoring samples might be positive, even at the high threshold of detection.

Indeed, EPA data relating PCB in water to PCB in air suggest that air levels must be excessive at dredging platform locations. EPA quantified the relationship between PCB concentrations in water from a cold river and in air 1 m above the river surface (US EPA, 2000a,b). For each microgram per liter (that is, for each 1,000 ppt) of PCB in river water, PCB concentrations in air (in  $\mu\text{g}/\text{m}^3$ ) were reported to be a minimum of 0.02, a median of 0.09, a mean of 0.15, and a maximum of 0.40  $\mu\text{g}/\text{m}^3$  (Michaels and Oko, 2007; US EPA, 2000a,b). When waterborne PCB reaches EPA's 500-ppt stop-dredging benchmark, airborne PCB 1 m above the river would be expected to be at about the mean observed value, 0.08  $\mu\text{g}/\text{m}^3$ . Significantly, that concentration also is EPA's airborne PCB *level of concern* (LOC). Measurements of waterborne PCB, revealing exceedances of the 500-ppt benchmark, were taken 5–7 miles downstream of dredging locations. Waterborne PCB concentrations at locations of dredge platforms must be higher, perhaps thousands of times higher than at locations miles away (ppm rather than ppt) or even millions of times higher (parts per thousand rather than trillion) where liquid PCB oils have been encountered. These massively higher waterborne concentrations imply massively higher airborne concentrations at dredge platform locations.

Potential occupational exposure at dredging platform locations also might be significantly greater than that implied by EPA's published relationship of waterborne PCB to airborne PCB. This is because the original EPA data relating airborne levels of PCB over a cold river to the source PCB levels in the river water do not account for dredge buckets in the Hudson River billowing sediments to the river surface as they close, and then lifting sediments and water above the surface, where leakage drops sediments and water violently onto the river surface. These processes must produce abundant droplets (*aerosols*) of various sizes, all containing PCBs, whereas air samples above river water in EPA's original data did not include this source of airborne PCB. So, for occupationally exposed individuals, the relationship of PCB levels in water to levels in air must be significantly worse, exposing them to inhalable PCBs that are volatilized, as well as to PCBs that are aerosolized. That unhealthy process happens yet again when the dredges swing their retained load over the barges and drop them again, this time in their entirety, producing yet another burst of PCB entry into the air in the form of vapors and aerosols near dredge platform personnel.

Though airborne PCB concentrations in the dredging corridor would seem to be higher than EPA's stop-dredging standards as explained earlier, the nearest measurements

are taken on shore rather than on location (see the previous section). EPA established a stop-dredging standard of 0.11  $\mu\text{g}/\text{m}^3$  for airborne PCB in residential zones and of 0.26  $\mu\text{g}/\text{m}^3$  for airborne PCB in commercial zones. Indeed, EPA ordered GE to stop dredging on multiple occasions, when the waterborne level was  $\geq 500$  ppt and presumably the air level was about  $\geq 0.08$   $\mu\text{g}/\text{m}^3$ .

## Conclusions and Recommendations

### Conclusions

Risks to human health potentially posed by airborne pathways of exposure to PCB under dredging and nondredging scenarios were neither assessed objectively nor compared. Water monitoring miles downstream of dredging to measure sediment loading or "resuspension" is inadequate to characterize PCB mobilization. Air monitoring using portable air samplers on shore is inadequate to quantify either residential or commercial exposure to airborne PCB. Results of personal air monitoring of GE dredging personnel remain undisclosed, therefore failing to satisfy the legitimate public interest in gaining access to this unique source of data on airborne PCB levels at dredge platforms. Levels of airborne PCB probably were higher than suggested by available data, and possibly unsafe.

EPA's emphasis on PCB sheens observed during dredging, rather than on the possibly substantial source pools of liquid PCB hidden from view in the river bottom, is misplaced. Dredged material treated and shipped to Texas represents a small fraction of the total mobilized in the river by clamshell dredges. This modest removal has been achieved at the cost of drastically increasing the surface area of contaminated river bottom. We estimate that Phase 1 increased the surface area of contaminated downstream riverbed by at least 3 orders of magnitude, from about 50 dredged acres to many square miles.<sup>3</sup>

Impacts of dredging will increase with increasing surface area of contaminated river bottom. EPA, however, primarily has quantified Phase 1 performance based upon the mass and volume of contaminated dredge spoils removed from hotspots beneath the relatively small Phase 1 dredging area. Hudson River PCB dredging, therefore, is making exposed people into experimental subjects, and riverfront communities into apt subjects of epidemiology studies that may continue for generations to come.

## Recommendations

Risks to human health potentially posed by airborne pathways of exposure to PCB under dredging and nondredging scenarios should be assessed objectively and compared via correction of prior EPA assessments before authorization is given to implement Phase 2. Acceptability of risks to human health potentially posed by dredging must be adopted as a precondition for undertaking Phase 2 of the project. Phase 2 also must increase the scope and duration of environmental monitoring to enable more reliable warning of harm in real time, and project evaluation over decades.

Water and air monitoring, including personal monitoring, should occur together at dredge platforms. Results of personal airborne exposure monitoring of GE dredging personnel to PCB should be made available to the public, minus confidential personal information, as has been the case with other project data. Permanent arrays of air and water samplers are needed to verify or refute EPA's prior safety claims, and to protect public and environmental health. The sources of PCB sheens, and the composition and volume of the possible source pools of PCB, should be investigated and, if possible, their relationship to originally disposed PCB liquids determined. Strategies to manage possibly rich sources of PCB liquids that dredge buckets disrupt and fail to hold must be developed to prevent mobilization of highly concentrated liquid PCB, and assure compliance with the benefit criterion.

Technologies should be considered for use in Phase 2, such as coffer damming, hydraulic dredging, and dredging within enclosures to minimize PCB mobilization, resuspension, and PCB entry into ecosystems and the air. *Vacuum dredging*, in which water, sediment, and rocks are captured without dispersing fine particles into the water column, may be the best method. The pontoons could be equipped with sedimentation basins in which flocculates that bind fine particulates can be added to the slurry. The slurry then should be filtered on site to return clean water into the river. Alternatively, the pontoons could move their entire load into the treatment plant, where proper treatment can be applied and the water returned to the river.

## Note Added in Support

An official Hudson River PCB Dredging Peer Review Panel advisory to EPA released its final report (Peer Review Panel, 2010) approximately two months after we submitted our manuscript to *Environmental Practice*. The Peer Review

Panel report must be interpreted in light of prohibitive EPA instructions regarding its allowable scope:

The Peer Review panel *will not evaluate* whether the Remedial Action [dredging] will, or may, achieve the human health and/or environmental objectives of the ROD [EPA's Record of Decision under the Superfund Law], *nor will the Peer Review panel evaluate* whether Phase 2 should be implemented. (p. 3, emphasis added)

The report nonetheless is informative about these issues, stating implicitly that which it was prohibited from saying explicitly: Phase 2 cannot be completed feasibly and safely in the allotted five-year time frame remaining using available data, models, and criteria for success:

There is a very real need to set an allowable load limit for the Hudson River dredging project, but neither the data nor tool(s) needed to do so currently exist. To that end, the project must develop a set of models that incorporate hydrodynamics, sediment transport, fate and transport of PCBs, and bioaccumulation of PCBs in the Upper Hudson River (from Fort Edward to Troy Dam). (p. 36)

Notwithstanding two decades of EPA planning, prerequisite data and models were lacking at project onset, including the amount of PCB in the river. Further, requisite data were not collected in Phase 1, nor were requisite models developed. Dredging, therefore, might require years longer to be completed safely:

Since the total volume to be removed is not known, it is not reasonable to project what the annual production would be based on a 5-year schedule for Phase 2. (pp. 75, 76)

and, therefore,

the 5-year productivity criterion should be dropped to provide more flexibility to complete the work in a manner that protects the integrity of the project *and its risk reduction objectives*. (pp. v, 78, emphasis added)

The Panel also found the following:

Phase 1 showed that the 2004 EPS [Engineering Performance Standards] for Resuspension, Residuals, and Productivity were not met individually or simultaneously during Phase 1 and cannot be met under Phase 2 without substantive changes. EPA and GE proposed changes to the EPS but *the Panel finds that the new proposed standards from either party would not contribute to the successful execution of Phase 2*. (pp. iii, 84, emphasis added)

## Notes

1. Calculation:  
286,006 cubic yards (yd<sup>3</sup>) of sediment barged in Phase 1, per GE bucket files (Table 2)

$\times 1.31 \text{ m}^3 \text{ per yd}^3 = 373,795 \text{ m}^3 = 3.74 \times 10^{11} \text{ cm}^3 \text{ barged}$   
 $\times 2.6 \text{ g/cm}^3 \text{ density} = 9.72 \times 10^{11} \text{ g} = 9.72 \times 10^8 \text{ kg}$   
 $= 9.72 \times 10^5 \text{ metric tons barged}$   
 $= 26\% (= 0.26) \text{ of dredge-disturbed sediments (dredge spoils);}$   
 $9.72 \times 10^5 \text{ metric tons barged}/0.26$   
 $= 3.7 \times 10^6 \text{ metric tons mobilized} = 3.7 \text{ million tonnes}$

- Under the Federal Safe Drinking Water Act of 1974 (amended in 1986 and 1996), water levels are enforced at the MCL, but regulators must strive toward the more stringent *MCL goal* (MCLG), if feasible. The MCLG is zero for carcinogens such as PCB. That raises the issue of whether, and under what circumstances, permitting dredging-associated increases of PCB levels in water is legal, even if the increased levels will remain within the 500-ppb MCL.
- The “many square miles” estimate is based upon EPA and GE monitoring data that show resuspended dredge spoils at sampling locations miles downstream, at which resuspension refers specifically to dredging-associated increments above the measured predredging background (Figure 2). The northernmost sample location was at Thompson Island, which is about 7 miles downstream of Rogers Island and about 5 miles downstream of the southernmost extent of the dredged area (at Griffith Island). Additional sampling points were further downstream of dredging, most notably including Waterford, about 40 miles downstream. Except for the dissolved and colloidal fractions (about half), resuspended material is subject to settling to the river bottom. Our estimate is conservative because the river bottom area receiving these sediments is many square miles, just counting the 40-mile stretch from the dredged area to Waterford, but it is a lot more considering that the material continues downstream to the Troy Dam and beyond, eventually to New York City and the ocean, over 100 miles downstream. Indeed, according to Key Findings in GE’s *Phase 1 Evaluation Report* (General Electric, 2010b) “downstream sediment cores of previously sampled areas showed an average increase of three times pre-dredging concentrations. These and other lines of evidence show that dredging caused wide-spread redistribution of PCB-containing sediments on the surface of the river bottom” (p. 77).

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### Appendix 3

**Michaels, Robert A.; and Uriel M. Oko.** *Excessive PCBs in the Hudson River: attributable to incompleteness of dredging, or to seven years of dredging?* Environmental Claims Journal, 29(2):115-40, 2017; online: <http://dx.doi.org/10.1080/10406026.2017.1307007>,  
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## Excessive PCBs in the Hudson River: Attributable to Incompleteness of Dredging, or to Seven Years of Dredging?

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### ABSTRACT

GE recently completed a seven-year US EPA-mandated clamshell dredging project to remediate PCB contamination of the Hudson River. Post-project PCB levels in water and fish, however, are higher than anticipated, suggesting to some the need to extend the project to remove more PCB-bearing sediments. Our investigation of the effectiveness of the dredging project revealed that a previously unconsidered physical process must mobilize sediments as a result of dredge bucket closure. We also used computerized dredging data ('bucket files') to estimate the fraction of dredged sediments returned to the river instead of being deposited into waiting barges. We conclude that excessive post-project PCBs in the Hudson River predominantly are attributable to sediment mobilization by clamshell dredges. We predict that proposed extension of the dredging project would prolong mobilization processes, allowing PCBs to spread widely and enter ecosystems that include people, endangered fish such as sturgeon, and endangered birds such as bald eagles.

### Introduction

GE (the General Electric Company) recently completed a seven-year US EPA-mandated clamshell dredging project to remediate PCB (polychlorinated biphenyl) contamination of the Hudson River. Post-project PCB levels in water and fish, however, are higher than anticipated, for example in 2016 requiring the New York State Department of Health (NYS DOH 2016) to recommend further restriction of fish consumption. NYS DOH issued a "Don't Eat" fish consumption advisory for walleye fish taken from the Hudson River downriver, between the Rip Van Winkle Bridge at Catskill and the Tappan Zee Bridge. This advisory is more stringent than the previous advisory, which recommended limiting intake of walleye to one meal per month. The current advisory was based upon new data showing elevated levels of PCBs in these fish.

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In 2007 the U.S. Environmental Protection Agency (US EPA) required GE to remediate the Hudson River PCB Superfund Site via dredging. Also in 2007, we reported pro-dredging bias in the form of errors in US EPA's baseline health risk assessment (HRA) for Hudson River PCBs; indeed, all nine identified errors were made in the dredging-friendly direction rather than randomly (Michaels and Oko 2007). Permissive HRA findings that resulted from these errors constituted a necessary condition for US EPA to conclude that dredging could be accomplished within acceptable health and environmental risk parameters, and to require GE to employ dredging for remediation of the site. The original purpose of site remediation via clamshell dredging was *to reduce safely and substantially the long-term downstream transport of PCBs* (Peer Review Panel 2010; US EPA 2002).

In 2010 we evaluated dredging Phase 1, consisting of a one-year attempt, in 2009, to demonstrate the feasibility of *clamshell* dredging as a multiyear remedy for the Hudson River PCB Superfund Site (Michaels and Oko 2010). The 2010 paper reported failure (of GE) to complete a significant fraction of the planned Phase 1 area within the allotted dredging season, and failure (of US EPA) to demonstrate the feasibility of implementing Phase 2 within acceptable environmental and health risk parameters. Similar conclusions were drawn by US EPA's peer review panel for Hudson River PCB dredging (Peer Review Panel 2010). Others more generally have characterized conventional clamshells as more typically used for navigational rather than for environmental dredging (for example, Bridges et al. 2008; Palermo et al. 2008):

*Although conventional dredges normally used for navigation dredging (e.g., conventional clamshells or cutterheads) can be effective for environmental dredging, evolving technologies for dredge and dredgehead designs (e.g., enclosed buckets, articulated fixed-arm mechanical, swinging ladder cutterheads, and articulated ladder cutterheads) may offer better performance for environmental dredging. (Palermo et al. 2008, 257; emphasis added)*

Accordingly, we recommended consideration of hydraulic dredging as originally proposed, or other alternatives to conventional *clamshells* (Michaels and Oko 2010). Indeed, US EPA specification of clamshell dredging in the Hudson River is unusual, as most PCB dredging from U.S. waters has relied upon hydraulic dredges, which were used, for example, in the New Bedford Harbor in Massachusetts, the Cumberland Bay in Plattsburgh, New York, and the Fox River in Green Bay, Wisconsin.

Notwithstanding the above, US EPA required GE to initiate Phase 2 in 2011, after a one-year hiatus in 2010 for project evaluation, culminating in our paper (Michaels and Oko 2010) and the peer review panel's adverse report (Peer Review Panel 2010). The scope of Year 1 of Phase 2, in 2011, included completion of the undredged Phase 1 area. As we reported, Phase 1 not only failed but, more fundamentally, it lacked the potential to succeed in demonstrating the feasibility of Phase 2, because Phase 2 posed two problems not posed in Phase 1: (1) dredging in faster-moving water, and (2) confining dredge-disturbed PCB-contaminated sediments to within isolated 'hot spots,' despite river currents capable of carrying mobilized PCB liquids, dissolved molecules, colloids, and suspended particulates downstream to areas in which future dredging was not planned.

Phase 1 differed from Phase 2 in being conducted largely at one side (the east side) of Rogers Island, where sediment transport was slowed by a nearby stone dam and sediment curtain. Phase 1 also predominantly involved bank-to-bank dredging. Phase 2 involved widely separated PCB hot spots and faster moving open river water. Redeposition of mobilized PCB-containing sediments in the Phase 1 area was followed generally by dredging, thereby minimizing the impact of dredge-disturbed sediment flow and mobilization beyond the dredging zone. Thus, US EPA's authorization to conduct Phase 2 based upon Phase 1 constituted a non sequitur.

Failure of Phase 1 to meet engineering performance standards (EPSs) and health risk criteria (Peer Review Panel 2010) was ominous for Phase 2 (Michaels and Oko 2007, 2010; Peer Review Panel 2010). Implementation of Phase 2 for two years, in 2011 and 2012, and its continuation in 2013 and for years thereafter until completion, together raised five emerging and unique issues that we evaluate here, including the following:

1. *Sediment mobilization*: US EPA accuracy in estimating PCB-contaminated sediment mobilized by dredging;
2. *PCB mobilization*: Possible PCB loss by desorption from resuspended sediment particles;
3. *Storms*: Possibly changing frequency of sediment-mobilizing high-flow events;
4. *Endangered species*: *Endangered species* classification of Hudson River sturgeon and bald eagles; and
5. *Autism*: Progress of research into possible PCB causation of autism.

## Methods

Our investigation included reviewing literature, making site visits, attending meetings, and evaluating several exposure and toxicology issues. We conducted three site visits to observe and photograph dredging, each time visiting US EPA's field office in Fort Edward, interviewing US EPA and GE personnel and contractors, analyzing dredging data, attending public meetings, and examining scientific and regulatory documents (for example, Harza 1992; NYS DEC 2000, 2003; PSEG NY 2001; Shavit, et al. 2003; UN EP 2003, and other sources in References). Our analysis adopts methods of health risk assessment (HRA), critical evaluation of project-related scientific information sources (for example, GE 2009, 2010a, 2010b, n.d.; US EPA 1999, 2000a, 2000b, 2001, 2006, 2010a, 2010b, 2010c, 2010d, 2010e, 2012, n.d.a, n.d.b), and objective scientific peer review. The latter are not a priori methods, and they are not described in detail here. Rather, they consist of diverse methods that are generally typical of peer review by scientists seeking to remain objective. Most essentially, these methods consist of our own disciplined, critical evaluation of the scientific merit with which numerous methods were selected for use and applied prior to dredging, during dredging Phase 1, and during Phase 2.

The scope of our assessment therefore includes our own peer review of GE and US EPA methods, findings, and conclusions, such as those reported orally in public meetings, and in written public communications on GE (n.d.) and US EPA (n.d.a,

n.d.b) Web sites for Hudson River dredging, and more formally in GE (2009, 2010a, 2010b, app. GE (2009, 2010a, 2010b) and US EPA (1999, 2000a, 2000b, 2001, 2006, 2010a, 2010b, 2010c, 2010d, 2010e, 2012) draft and final reports published for consideration by the public, specific interested parties, and members of the Hudson River dredging project peer review panel (Peer Review Panel 2010). Members of the public and other readers of our assessment can judge for themselves whether and to what degree we succeeded in applying the methods of HRA and of peer review objectively. We hope that we have done so completely.

## Findings

### General

Mobilization of dredge-disturbed sediment was  $\geq 100$  times higher than measured by US EPA's engineering performance standard (EPS) for resuspension, and no EPS exists to detect, quantify, or reduce downstream sediment redeposition. Much PCB adsorbed to dredge-disturbed sediment desorbs within minutes of mixing into river water. This fugitive molecular and colloidal PCB is transported downstream, but missed in routine resuspension monitoring. Complicating matters, the frequency and intensity of storms is increasing. Invisible to EPSs, storms may scour fugitive PCB-contaminated sediment, and transport it downstream gradually and episodically, over years or decades. Long-term downstream transport of PCB poses risks to endangered species, possibly including extirpation of sensitive sturgeon from the Hudson River. Finally, recent animal research links PCBs to developmental processes that, in humans, are thought to underlie autism causation, but US EPA has failed to address potential autism risks.

### ***Issue 1, sediment mobilization: US EPA accuracy in estimating PCB-contaminated sediment mobilized by dredging***

***Sediment mobilization by dredge jaw closing.*** Sediment resuspension arising from bucket (clamshell) dredging is reported to “result from the impact, penetration, and removal [of the dredge bucket] from the bottom sediments; leakage while raising it through and out of the water column; and washing during movement through the water column” (Zappi and Hayes 1991, citing Barnard 1978). Resulting “suspended solids in the area of influence of the bucket dredge, without hopper barge overflow, can range from 20 to 1,100 mg/L” (Zappi and Hayes 1991, citing McLellan et al. 1989). A process contributing to sediment mobilization that apparently has been neither addressed nor described previously is generation of a suction force behind closing dredge jaws.

Specifically, the sediment fraction mobilized has been calculated previously relative to a full dredge bucket, but that parameter fails to account for the mobilizing effects of closing dredge jaws on sediment that is situated outside of the bucket. Dredge bucket jaws are constructed of rigid walls of steel that are suspended beneath



**Figure 1.** Hudson River dredge showing bucket suspended beneath superstructure.

a rigid nonsolid steel superstructure (Fig. 1). The jaws of a typical 5-cubic-yard (3.85-cubic-meter) bucket used in the Hudson River each have an open cross-sectional area of 88 square feet (9.8 square meters) measuring 7.1 feet (2.2 meters) in width and approximately 4.4 feet (1.3 meters) in height, producing a solid cross-sectional area of > 30 square feet (3 square meters). The superstructure adds another 6 feet (1.8 meters) of height, producing a total of over 10 feet (3 meters).

The total cross-sectional area that moves through river water during closing of each dredge jaw therefore is approximately 50 square feet (4.6 square meters), most of it above river sediment grade (typical dredge jaw penetration depth is up to 1.5 feet (0.5 meter), visible as the abraded area at the bottom of the bucket depicted in Fig. 1). The angle of attack changes (becomes more vertical) as the bucket closes and, of course, the velocity of jaw movement through the water is greatest toward the bottom, which also is the solid portion of the dredge bucket.

As the bucket jaws close, physics requires that they create three strong currents. One current results from compression of water and sediment situated between the closing bucket jaws. It forces water and sediment out of the dredge bucket. The other two currents result from suction of water and sediment situated in the reduced-pressure zone behind each dredge jaw. These latter two currents exert a force that drags water and sediment, causing them to follow behind moving dredge jaws as they close. All three forces create turbulence. The compressive force, especially because it drives water and sediment upward through the open top of dredge jaws,

produces turbulent eddies of sediment typically extending to the river surface, readily visible and varying from gray to black, depending upon location in the river.

The inward-directed suction force exerted in the reduced-pressure zone behind the dredge jaws acts on water much as a moving vehicle acts on air. This force is manifested (for example) by race cars drafting close behind another car to accelerate by using the powerful suction force created by the lead car's evacuation of air behind it. The suction force also is made visible as opaque diesel exhausts flow over the tops of moving trucks and are sucked turbulently downward in the trailing low-pressure zone. Physics demands that loose or uncompacted sediment situated outside each opposing jaw of dredge buckets likewise must be sucked off the river bottom during bucket closure. The swirling sediment then is left in the river as the dredge buckets are lifted to the surface and beyond.

Sediment mobilization is quantified by comparison of sediment volumes placed in barges with sediment volumes dredged in each bucket closure. Bucket closures are recorded automatically via computers on board dredge platforms, and published as the 'bucket files' (GE 2010b; Michaels and Oko 2010; US EPA 2010a). Sediment that is mobilized behind closing dredge jaws, however, is routinely not quantified in the bucket files, because such sediment is not dredged and not placed in barges. For example, consider a typical five-cubic-yard dredge bucket that penetrates to a sediment depth designed to fill it to 80 percent of full capacity. Its field capacity would be four cubic yards ( $0.8 \times 5$  cubic yards). If only two of the four cubic yards are barged, by subtraction the inferred mobilization also is two cubic yards, or 50 percent of field capacity.

The mobilization fraction calculated as above excludes turbulent sediment mobilization due to suction generated by each closing dredge jaw. Accordingly, the actual mobilization fraction is higher by the amount disrupted outside each dredge bucket jaw. Physics demands that the compressive force exerted to the interior of dredge bucket walls equal the suction force exerted outside. A reasonable approximation, therefore, is that uncounted sediment mobilization outside dredge buckets roughly equals the amount of sediment that is mobilized within buckets. This approximation also is conservative, inasmuch as the sediment that can be mobilized includes that situated behind each of two dredge jaws. This added mobilization factor gives rise to the possibility of the sediment mobilization fraction exceeding 100 percent of the dredge bucket field capacity. That is, dredge buckets cannot mobilize more sediment than they contain, unless (as described above) they also mobilize sediment that they do not contain.

***Estimation of sediment mobilization fraction.*** We previously made two independent quantitative estimates of the fraction of sediment mobilized when a dredge bucket descends to the river bottom, closes, lifts its load, and transfers its load to a waiting barge (Michaels and Oko 2010). One estimate, based upon the difference between sediment volume enclosed by an open versus a closed dredge bucket, was a mobilization fraction of approximately 80 percent. The other, based upon analysis of published bucket files versus published barged-sediment data, was approximately

75 percent during Phase 1, Year 1. These values exclude consideration of the new factor described above, i.e., suction creating turbulence behind closing dredge jaws.

A related factor, likewise unquantified (in Michaels and Oko 2010, and also herein), is failure of bucket closure, that is, turbulent mobilization of sediments by descending dredge jaws that cannot close when they encounter obstacles on the river bottom (such as bicycles, automobile tires, logs, boards, rocks, concrete blocks, rebar, and other construction debris). When dredge buckets fail to close, the onboard computer does not record the data in the bucket files. Indeed, for this reason, the fraction of bucket descents that result in nonclosure is unknown, notwithstanding that these bucket descents mobilize sediment in the river. Most essentially, notwithstanding our inability to quantify some parameters precisely, the factors described above, along with bucket geometry and computerized bucket data, indicate that dredge buckets dumped more material back into the river than into waiting barges. That material remains mobile via physical processes or, if taken up by biota, through ecosystem dynamics.

The two factors described above, though we cannot quantify them exactly, at the least add conservatism to our previously published estimates of 75–80 percent sediment mobilization per bucket closure. This fraction was applicable to dredge buckets, but was significantly (but likewise to an unquantified degree) reduced when considering overall sediment mobilization in Phase 1, because of bank-to-bank dredging. Such redredging in Phase 1, however, is not a feature of Phase 2 (except in its first year, 2011, which included bank-to-bank dredging of the uncompleted Phase 1 area), because Phase 2 addresses widely spaced PCB hot spots. Sediments that are resuspended and carried downstream beyond a PCB hot spot may redeposit on a portion of the river bottom that will never be dredged (or redredged). Phase 2 hot spot dredging comprises the preponderance of the forty-mile (sixty-four-kilometer) stretch of the Upper Hudson River that is included in the dredging project, making the per-bucket mobilization fraction highly relevant for Phase 2. Given the preponderant scope of Phase 2, the per-bucket mobilization fraction is relevant in evaluating the Hudson River dredging project in its entirety.

## ***Issue 2, PCB mobilization: Possible PCB loss by desorption from resuspended sediment particles***

***Estimation of PCB mobilization fraction.*** Apart from the *sediment* mobilization fraction addressed above is the related issue of the possibly different *PCB* mobilization fraction. *PCB* might be mobilized by desorption from dredge-disturbed sediment as particle surfaces encounter relatively *PCB*-free river water. To the degree that this occurs, *PCB* may be mobilized from dredge-disturbed sediment as it falls back to the river bottom or remains suspended (resuspended) in the water column. Such desorption produces free *PCBs* in the molecular and colloidal phase, which are transported downstream with river water. Free *PCB* in river water no longer is adsorbed to clay or silt particles. Sampling of clay or silt particles in routine resuspension monitoring would not capture free *PCBs* in dissolved or colloidal form.

“PCB in colloidal form constitutes the most mobile form of PCB in water, being affected only minimally by settling, physical retention or adsorption” (Paquin 2001).

To develop a more realistic picture of resuspension, we estimate, roughly but quantitatively, the amount of fugitive free PCB that clamshell dredging might have created in Phase 2. Fugitive PCB originates, and primarily is carried by, fine particles of silt, clay, and sand that, together, give rise to free PCB via desorption. Accordingly, we used data on hydraulic dredging to derive information on the size distribution and resuspension of such sediment in moving water like the Hudson River. Available literature (Nau-Ritter et al. 1982) indicates that approximately 30 percent of PCB adsorbed to resuspended sediment particles desorbs and enters river water in dissolved or colloidal form within minutes of resuspension. Further, most fine particles (‘fines’) remain resuspended for hours to weeks before settling, during which they slowly release most if not all of the remaining 70 percent of adsorbed PCB (Schneider 2005). We assume that much or most of the 70 percent is captured by routine resuspension monitoring. The 30 percent that quickly enters the aqueous phase, however, would not be captured in routine particle monitoring for verification of compliance with US EPA’s EPS for resuspension.

The *mass* of PCB corresponding to loss of 30 percent desorbed from particles of dredge-disturbed sediment to the aqueous phase is missed in monitoring PCB *concentration* in water, due to river flow variation. We approximate it as follows. We do not know the exact size distribution of resuspended particles, but laboratory development of a dredging elutriate test (DiGiano et al. 1995) revealed that turbulence mixes a wide range of particle sizes into the water column, but denser particles settle preferentially, leaving behind an elutriate (supernatant) of less dense resuspended particles, of which 90 percent were  $\leq 10\text{-}\mu\text{m}$  (micrometer, or micron) diameter. The most common size class was  $4\ \mu\text{m}$ . Accordingly, we similarly assume spherical particles of diameter  $4\ \mu\text{m}$ . Although the particles are resuspended, we assume a heavier-than-water specific gravity of 1.8, which, as they are small, can be maintained in suspension by turbulence in river water. This specific gravity is somewhat lower than 2.6 previously reported for Hudson River sediments (Gruendell 1966; Michaels and Oko 2010), as we also assume here that relatively lighter resuspended particles are enriched in relatively less dense organic matter.

Our  $4\text{-}\mu\text{m}$  spherical particle model is only a rough guide. Fine particles resuspended after dredge disturbance actually are nonspherical, and some are more porous than others, whereas we assume hard spheres. Both properties increase surface area. For example, clay, an important constituent of silt, is both porous and nonspherical, with particle surface areas of  $200\text{--}600\ \text{m}^2/\text{g}$  (square meters/gram). Our hard-sphere model therefore is conservative, because porous-nonspherical particles have more surface area, can adsorb more PCB, and thus can desorb more PCB to river water.

The high surface area of small sediment particles such as clay disproportionately carries resuspended PCB (DiGiano et al. 1995; Anchor Environmental 2003; Michaels and Oko 2010). We assume that each resuspended hard-spherical particle is coated initially with a monolayer of PCB molecules. We also assume an average



**Table 1.** PCB desorption from resuspended sediment in ten-acre Phase-1 Year-1 Hudson River dredging area.\*

Mass of PCB rapidly desorbed from a resuspended spherical sediment particle of diameter four microns		
radius of 4-micron ( $\mu\text{m}$ ) diameter spherical particle	2	$\mu\text{m}$
surface area of spherical particle of 4- $\mu\text{m}$ diameter: $4\pi r^2$	50.3	sq. $\mu\text{m}$
area occupied by one molecule of (decachlorinated) PCB	300	sq. angstroms
area occupied by one molecule of (decachlorinated) PCB	3.00 E-06	sq. $\mu\text{m}$
PCB molecules in monolayer on one 4- $\mu\text{m}$ -diameter particle	1.68 E+07	PCB molecules
molecular weight (MW) of the PCB molecule	240	g/mole
number of PCB molecules per mole (Avogadro's number)	6.02 E+23	PCB molecules
moles of PCB monolayer adsorbed to 4- $\mu\text{m}$ diameter particle	2.78 E-17	moles
mass of PCB molecules on one 4- $\mu\text{m}$ diameter particle	6.68 E-15	g
fraction of PCB rapidly desorbed and entering river in aqueous Phase	0.3	...
mass of PCB rapidly desorbed to water, per 4- $\mu\text{m}$ diameter particle	2.00 E-15	g/0.04- $\mu\text{m}$ particle
Mass of a resuspended spherical sediment particle of diameter 4 microns		
volume of spherical particle of 4- $\mu\text{m}$ diameter: $4/3\pi r^3$	3.35 E+01	cu. $\mu\text{m}$
conversion, cubic $\mu\text{m}$ to liter (= 1,000 cu. cm)	1.00 E-15	cu. $\mu\text{m}$ /liter
volume of spherical particle of 4- $\mu\text{m}$ diameter: $4/3\pi r^3$	3.35 E-14	liters
specific gravity of 4- $\mu\text{m}$ diameter spherical particle	1.8	g/mL = kg/liter
conversion, g/mL to g/cu. m	1.00 E-06	(g/cu. m)/(g/mL)
specific gravity of 4- $\mu\text{m}$ diameter spherical particle	1.80 E+06	g/cu. m
mass of spherical particle of 4- $\mu\text{m}$ diameter	6.03 E-14	kg/0.04- $\mu\text{m}$ particle
mass of spherical particle of 4- $\mu\text{m}$ diameter	6.03 E-11	g/0.04- $\mu\text{m}$ particle
Number of spherical sediment particles of diameter four microns fitting into a five-cubic yard dredge bucket		
conversion, cubic yards to cubic meters	7.65 E-01	cu. m/cu. yd.
volume of 5-cubic yard dredge bucket	3.82 E+00	cu. m
field capacity if filled to 80 percent of full capacity	3.06 E+00	cu. m
volume of spherical sediment particle of 4- $\mu\text{m}$ diameter	3.35 E+01	cu. $\mu\text{m}$
conversion, cubic $\mu\text{m}$ to cubic m	1.00 E-18	cu. m/cu. $\mu\text{m}$
volume of spherical sediment particle of 4- $\mu\text{m}$ diameter	3.35 E-17	cu. m
no. of 4- $\mu\text{m}$ spherical sediment particles per 5-cubic yard bucket	9.13 E+16	particles/bucket
Allowable resuspension in ten-acre Phase-1 Year-1 dredging area, under US EPA's 2 percent-EPS		
mass of sediment particles per 5-cubic yard dredge bucket	5.50 E+03	kg
US EPA engineering performance standard (EPS) for resuspension	2	percent
allowable resuspended particle mass, in accordance with EPS	110.1	kg/5-cu. yd. bucket
bucket closures in ten-acre area dredged in Phase 1 Year 1	221,521	closures/10 acres
allowable resuspended particle mass, in ten-acre Phase-1 Year-1 area	2.44 E+07	kg/10 acres
Mass of PCB rapidly desorbed to water from resuspended particles in ten-acre Phase-1 Year-1 area		
4- $\mu\text{m}$ diameter spherical particles per gram	1.66 E+10	particles/gram
4- $\mu\text{m}$ particles resuspended in ten-acre Phase-1 Year-1 area	4.04 E+20	particles
mass of PCB adsorbed as monolayer on resuspended particles	2.70 E+03	kg of PCB adsorbed
mass of PCB rapidly desorbed from resuspended particles	8.10 E+02	kg of PCB desorbed

\*Scientific notation:  $1.00 \times 10^{+01}$  tabulated as 1.00 E+01.

PCB molecular weight of 240 grams/mole. Table 1 (above) shows the following calculated parameter values:

1. the mass of a monolayer of PCB on a 4- $\mu\text{m}$  spherical particle is  $2.00 \times 10^{-15}$  g;
2. the mass of a particle of 4- $\mu\text{m}$  diameter and specific gravity 1.8 is  $6.03 \times 10^{-11}$  g;
3. an 80 percent-full 5-cu. yd. dredge bucket can contain  $9.13 \times 10^{16}$  4- $\mu\text{m}$  particles;



**Figure 2.** At Waterford: GE projected years needed to match no-dredging, assuming zero dredge mobilization of PCB other than ‘resuspension’.

4. US EPA’s 2 percent-EPS allows resuspension of  $2.44 \times 10^7$  kg in the ten-acre Phase 1, Year 1 dredging area; and

5. the estimated mass of PCB desorbed to the river in aqueous phase is 810 kg.

GE estimates show that the break-even point, at which dredging will have reduced PCB mobilization as much as it has increased it during the dredging project, would be twenty years, assuming compliance with US EPA’s 2 percent-EPS for resuspension. This would bring the break-even year to 2032 (Fig. 2). Under GE’s highest mobilization assumption, 5 percent of sediment is released back to the river “at the dredgehead,” in which case dredging will require forty-six years to match the effectiveness of the no-action remediation alternative. *That is, no benefit can be expected until the year 2057 at the earliest, optimistically assuming no delays and, critically (see Discussion), no mobilization of PCB sediments other than ‘resuspension’.*

### **Issue 3, storms: Possibly changing frequency of sediment-mobilizing high flow events**

After the first season of dredging, GE reported (Carson 1962; DiGiano et al. 1995; Gardiner et al. 1996) that sediment samples outside the dredged area “show that dredging caused wide-spread redistribution of PCB-containing sediments on the surface of the river bottom.” High-flow events already have driven some of this dredge-mobilized sediment downstream (see, e.g., Islam et al. 2012, 24). Indeed, recent years have evinced a trend toward increasing frequency and intensity of storms (Matonse and Frei 2012, 25), including extreme events such as Hurricane Katrina in 2005, Irene in 2011, and Sandy in 2012, all attaining extraordinary energy, largely from warmer ocean water in their path (see, e.g., Trenberth 2007).

Evident global climate change (whatever may be the less-well-known contribution of civilization to it) has been manifest in a concomitant trend toward more frequent high-flow events in rivers and streams, resulting from rainfall, tidal surges, and flooding. Indeed, Matonse and Frei (2012) investigated whether the hydrological impacts of Hurricane Irene and Tropical Storm Lee continue a historical trend toward increasing frequency of extreme hydrological events in New York State's Catskill Mountains and Hudson River Valley region. They found

a marked increase in the frequency of extreme hydrologic events during the last one to two decades. This increasing trend is more evident during the late summer and early fall, the season of the most extreme precipitation events.

This trend, therefore, can be extrapolated to the future, and incorporated into Superfund remediation project assumptions, including assumptions for Hudson River PCB dredging.

Tropical Storms Irene and Lee caused 100-year and 500-year flooding, in which the Mohawk River carved new channels up to forty-five-feet deep. The storms exerted comparable impacts on the Hudson River. For example, the storms delivered an extraordinary amount of fresh water to the Hudson River watershed, along with a U.S. Geological Survey (USGS) estimate of nearly three million tons ( $2.7 \times 10^6$  kg) of sediment (Wall and Hoffman 2012, 18).

Potential effects of swift river flow include scouring of PCB-laden sediment exposed by dredging to downstream areas, washing away of plantings designed to stabilize the river bottom and reestablish ecosystems, disruption of caps placed over residual PCB-containing sediments, flooding, and depositing PCB sediment on the shore as 'flood mud.' Islam et al. (2012, 17), investigating the impact of Tropical Storm Irene-associated precipitation on the Hudson River and estuary ecosystem, reported the following:

Continuous monitoring data at the PCB superfund site at Fort Edward, NY ... showed significant and coincident increases in sediment flux (22 metric ton/hr to 2400 metric ton/hr) and stream flow (85 m<sup>3</sup>/s to 480 m<sup>3</sup>/s) following Irene. In addition, in-situ particle size measurements suggest that significant amounts of small particles (<70 μm diameter) were transported during the flood event.

Moreover, the contribution of these extreme storm effects to the overall loading is comparable to that of long-term sediment transport under ordinary conditions. This suggests that effects of episodic events should be considered as part of ecosystem management during activities such as navigational channel dredging, remediation projects, and long-term water usage and discharge control.

#### ***Issue 4, endangered species: Endangered species classification of Hudson River sturgeon***

US EPA reported that PCB concentrations in fish tissue in the Upper Hudson River increased fivefold after the first year of dredging (US EPA 2010a, 2010e, 2012, n.d.a, n.d.b). US EPA reported more recently that PCB concentrations in fish tissue in the Upper Hudson River sampling area have returned to normal, presumably due to a combination of contaminated sediment removal and downstream transport

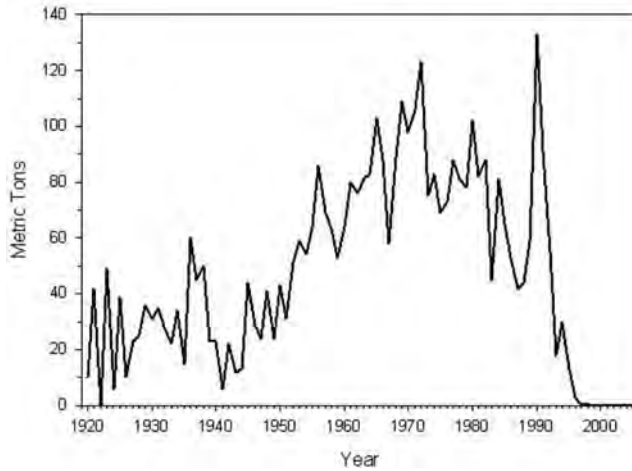
of residuals (*Id.* 2010e, 2012, n.d.a, n.d.b). Indeed, US EPA's Hudson field office director David King acknowledged orally at a conference at Marist College (January 16, 2013) that twenty to thirty years might be required for PCB levels in fish tissue to decline again to levels safe for human consumption. Resuspended PCB transported downstream is assumed (by us and by US EPA) eventually to reach the Lower Hudson River, which is the principal habitat of two species of sturgeon (Shepherd 2006; USDOC 2012). Indeed, such transport is more than theoretical, but has been documented empirically. Hudson River Natural Resource Trustees reported (NYS et al. 2013) that PCB transport (mostly prior to dredging) already has resulted in PCB contamination of the Lower Hudson River:

The Hudson River Natural Resource Trustees are conducting a natural resource damage assessment (NRDA) to investigate natural resource injuries that may have occurred due to the release of polychlorinated biphenyls (PCBs) from General Electric (GE) facilities at Hudson Falls and Fort Edward, NY. This report summarizes available information on PCB contamination in the Hudson River ecosystem, including historic information, but focusing particularly on data collected and analyzed between 2002 and 2008 as part of ongoing NRDA activities. **The Hudson River, for greater than 200 miles below Hudson Falls, NY, is extensively contaminated with PCBs.** Surface waters, sediments, floodplain soils, fish, birds, wildlife, and other biota are all contaminated with PCBs. (NYS et al. 2013, 1; emphasis added)

The shortnose sturgeon (*Acipenser brevirostrum*) was listed as endangered in 1967, though (in 2006; Shepherd 2006) it appeared to be recovering inasmuch as it has not been a target of fishing since 1967. The U.S. Department of Commerce, on February 6, 2012, added the Atlantic sturgeon (*Acipenser oxyrinchus oxyrinchus*) to the *Endangered Species List* (US DOC 2012). The Commerce Department must protect sturgeon habitat—principally the Hudson River (Shepherd 2006)—as required by the federal Endangered Species Act. Loss of habitat is a big part of the problem of loss of sturgeon, inasmuch as the principle alternative loss factor, fishing for either species of sturgeon, has been prohibited for well over a decade, since a moratorium on harvesting wild Atlantic sturgeon was imposed in 1998 after decades of overfishing. Commercial landings of Atlantic sturgeon crashed before the moratorium was imposed (Fig. 3; Shepherd 2006). The Lower Hudson River, below the Federal Dam at Troy, evidently will be impacted by PCBs for years or decades as contaminated dredge-mobilized sediments are scoured and transported downstream from an increasing area of river bottom in the Upper Hudson River, at Fort Edward and to the south.

Early life stages of sturgeon including larvae and eggs—*caviar*—are particularly susceptible to PCB contamination (US EPA 2010c). According to US EPA (previous to the official *Endangered Species* classification of the Atlantic sturgeon): “Fragile populations of threatened and endangered species in the Lower Hudson River, represented by the bald eagle and shortnose sturgeon, are particularly susceptible to adverse effects from future PCB exposure.”

By “future PCB exposure” US EPA (2010c) meant future exposure if dredging does not occur, but dredging did occur. PCB levels in Lower Hudson River water presumably will vary over space and time as they increase gradually to an



**Figure 3.** Total commercial landings of Atlantic sturgeon in the United States historically.

Source: G. Shepherd. 2006. Status of fishery resources off the northeastern United States. Atlantic and shortnose sturgeons: Atlantic (*Acipenser oxyrinchus*), shortnose (*Acipenser brevirostrum*). National Oceanic and Atmospheric Administration (NOAA), Northeast Fisheries Science Center (NEFSC), Resource Evaluation and Assessment Division, <http://www.nefsc.noaa.gov/sos/spsyn/af/sturgeon/>

undetermined maximum over a period of years or decades, during which annual sturgeon reproductive cycles will be stressed. The degree of stress, and ability of already-stressed sturgeon populations to withstand it, both remain unknown.

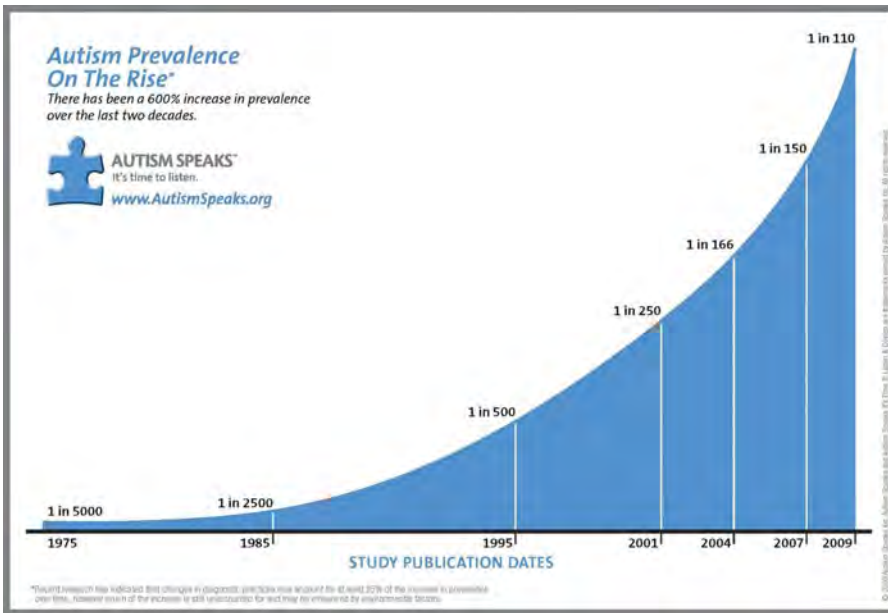
Modeling of the dynamics of three million tons of sediment loading into the Hudson River following Tropical Storms Irene and Lee, undertaken by Ralston, Geyer, and Warner (2012, 11), revealed the following:

The simulated sediment transport showed surprisingly little sediment export—most of the sediment delivered by the storms was trapped in the tidal river north of West Point, according to the model.

Similar dynamics may be expected from PCB-bearing sediments mobilized by dredging. That is, estuaries can trap sediments and the toxins that they harbor, to the detriment of ecosystems including Hudson River sturgeon occurring below the Federal Dam at Troy.

### ***Issue 5, autism: Research into possible PCB causation of autism***

PCBs are known neurotoxicants (ATSDR 2000). Moreover, PCBs have been implicated in causation of Parkinson’s disease (Goldman et al. 2016), ADHD (Keil and Lein 2016), and autism ((Keil and Lein 2016; Landrigan et al. 2012; Wayman et al. 2012a, 2012b). PCBs also are known developmental neurotoxicants *at environmental levels of exposure* (ATSDR 2000). Based upon prospective epidemiology studies, maternal exposure to PCBs during pregnancy has been linked to dyslexia, attention deficit hyperactivity disorder (ADHD), and loss of cognition (reduced IQ; Winneke 2011). More recent (animal) studies now link PCBs to DNA methylation (Keil and Lein 2016) and to specific developmental processes that, in humans, are thought to



**Figure 4.** Autism prevalence trend.

underlie causation of autism (Landrigan et al. 2012; Wayman et al. 2012a, 2012b), most notably the following:

1. stimulation of calcium signaling in the brain that alters nerve cell dendrite branching;
2. increased dendrite growth and branching; and
3. alteration of synapse formation in developing brains (in animal bioassays).

The prevalence of autism has been increasing dramatically in recent decades (Fig. 4; Autism Speaks n.d.), and today affects 1.13 percent of children (one of eighty-eight; Autism Speaks n.d.; Landrigan et al. 2012; USDOH 2012) and nearly one of fifty-four boys (Autism Speaks n.d.). A substantial portion of the increase in autism prevalence evidently is attributable to environmental factors. Boys are nearly five times more likely than girls to have autism (Autism Speaks n.d.), suggesting sex-linked inheritance of susceptibility factors, as boys have just a single (maternal) X chromosome that, if damaged, lacks potential compensation from genes in a counterpart (paternal) X chromosome as is the case in girls, who inherit an X chromosome from each parent.

## Discussion, conclusions, and recommendations

### **Issue 1, sediment mobilization: US EPA accuracy in estimating PCB-contaminated sediment mobilized by dredging**

US EPA's engineering performance standard (EPS) pointedly refers to "resuspension," not "mobilization." These terms might seem intuitively synonymous but,

in US EPA parlance, *resuspension* denotes just a miniscule fraction of dredge-mobilization of sediment. A significant *sediment mobilization discrepancy* therefore exists between sediment that is mobilized by dredging versus the much smaller amount of sediment that is measured and reported by GE, and used to document compliance with the US EPA resuspension EPS. The discrepancy arises from the fact that the preponderance of dredge-resuspended sediment falls back to the riverbed, and remains on the river bottom, still mobile, but unrecorded by GE or US EPA because its resuspension typically is episodic over years to decades and, in the main, has not yet occurred.

US EPA (2010d, 2010e, n.d.a) EPSs limit dredge mobilization of sediments to a maximum of 2 percent “at the dredgehead.” Results of US EPA modeling using HUDTOX, however, clearly indicated that the 2-percent EPS, even for resuspension alone, could not be attained at the dredgehead; indeed, it was redefined upward simply by changing (at least doubling) the estimated mass of PCB to be dredged (and also the allowable resuspension fraction), and therefore the amount (mass) of allowable PCB resuspension:

[The Record of Decision] originally estimated the PCB mass to be removed as approximately 70,000 kg, and the total project cumulative load standard was set at just below 1 percent of this total, or 650 kg. Based on the Phase 1 experience and additional sampling results, the estimated PCB mass for the entire project has been revised to the range 140,000 to 200,000 kg. (US EPA 2010d, 4–2).

The sediment mobilization problem also was highlighted by US EPA’s Hudson River Dredging Peer Review Panel. The panel’s initial draft report (Peer Review Panel 2010), published to elicit comments, made an interesting error that was followed by a more interesting response by US EPA. The panel’s comment no. 6 stated the following:

[EPA’s] incomplete analysis done for the 2004 EPS does not consider near-field and far-field PCB deposition rates on the sediment bed surface.

Thus, according to the peer review panel, US EPA failed to consider sediment mobilization at the dredgehead (“near field”), where dredged sediments are mobilized. US EPA’s response to Hudson River Dredging Peer Review Panel comment no. 6 is highly informative regarding this issue, and exemplifies US EPA’s worst practice in handling data that might interfere with Agency plans:

EPA did simulate near-field suspended matter transport and settling in its near-field modeling analysis. The HUDTOX model runs did not reflect the near-field settled solids but *did incorporate* an estimate of dredging-related suspended solids transport 1,000 meters downstream of the dredge. This analysis was the basis for the EPA forecasts of dredging-related *resuspension*. (US EPA 2010b; emphasis added)

Thus, US EPA apparently could not meet the 2-percent (originally 1-percent) EPS limit at the dredgehead, so it declined to apply its HUDTOX modeling results at the dredgehead to forecast dredging-related resuspension quantitatively. Instead, US EPA applied results obtained from HUDTOX at a cleaner place in the river,

1,000 meters downstream of dredging. Inasmuch as nearly all dredge-disturbed sediment (orally reported by US EPA at roughly 99 percent) falls back to the river bottom near the dredgehead, the use of HUDTOX results from 1,000 meters downstream ignores roughly 99 percent of resuspension occurring at the dredgehead. This is at best misleading and, indeed, the expert peer review panel was misled as indicated by its incorrect criticism (quoted above) that US EPA had failed to model resuspension at the dredgehead (in the “near field”). The Agency did do the modeling, but (as US EPA stated) declined to use the results.

As explained, sediment mobilization via dredging includes resuspension (at the dredgehead or wherever estimated) as well as the preponderance of dredge-disturbed sediment that falls back to the riverbed and is not barged (which we approximated conservatively at 75–80 percent of the amount initially excavated). This sediment drops back to the river bottom, still mobile, but it is excluded from US EPA’s resuspension parameter. US EPA’s statement quoted above therefore shows that the Agency justified dredging by ignoring gradual erosion from the river bottom of dredge-mobilized PCB-bearing sediments, which reasonably would be expected to occur over a period of years to decades. The Agency thereby also ignored inevitable, though gradual, entry of PCBs from these sediments into downstream water, ecosystems, and air. Thus, in fifty years US EPA conceivably might find the river to be in much the same condition from GE dredging up sediments today as it was found to be fifty years ago from GE disposal of PCB into the river.

The modeling and data handling issues raised above presumably would have come under scrutiny by US EPA’s Hudson River PCB Dredging Peer Review Panel, but US EPA explicitly prohibited the panel from opining whether dredging should continue, or whether Phase 2, if undertaken, could meet project health goals. Nonetheless, the Peer Review Panel (2010) rejected US EPA’s response, quoted above, concluding in its final report:

Phase 1 showed that the 2004 EPS [engineering performance standards] for Resuspension, Residuals, and Productivity were not met individually or simultaneously during Phase 1 and cannot be met under Phase 2 without substantive changes. EPA and GE proposed changes to the EPS, but the Panel finds that the new proposed standards from either party would not contribute to the successful execution of Phase 2. (*Id.*, 84)

The *sediment mobilization discrepancy* discussed above represents more than merely a difference between a predicted versus a measured parameter value. It represents a fundamental inconsistency in US EPA’s past justification of the need to dredge versus US EPA’s current characterization of the performance of the dredging project. The need for dredging was justified by the observed, persistent mobility of PCB sediments requiring, according to US EPA, their removal via dredging. In contrast, in the new context of actual dredging, US EPA dramatically has altered its concept of mobility. *Mobility* in the dredging project is newly quantified by the miniscule fraction of mobilized (resuspended) PCB that is detected at significant distance downstream. Thus, US EPA has ignored nearly all sediment and PCB mobilization in



evaluating compliance with the engineering performance standard *for resuspension*. In ignoring mobility of PCB-containing dredge-mobilized sediments for gauging compliance with the resuspension EPS, US EPA has ignored a much larger degree of PCB sediment mobility than that which constituted US EPA's most essential basis for requiring, in 2007, remediation of the Hudson River PCB Superfund Site via dredging.

Failure of US EPA to use HUDTOX modeling results at the dredgehead is not the only example of misleading use of modeling or monitoring data by US EPA, and should be viewed in this broader context. One example will suffice. In seeking to justify dredging, US EPA had prepared a baseline health risk assessment (HRA; US EPA 1999, 2000a, 2000b) that excluded all mono- and di-chlorinated PCB congeners based upon a misleading premise, specifically, that these congeners do not bioaccumulate in fish tissue, which contributes to human exposure to PCBs (Michaels and Oko 2007). The mono- and di-chlorinated congeners, even if they bioconcentrate less dramatically than the higher-chlorinated congeners, still are present in fish tissue. They should have been present in the HRA.

In the 1960s, Rachel Carson's *Silent Spring* (1962) famously raised awareness of environmental risks posed by DDT, which is a nearly identical twin of PCBs (Michaels and Oko 2010). Both DDT and PCBs contribute to human health risk by entering air, water, and ecosystems that include food chains terminating in consumption of fish and birds by people. Higher-chlorinated PCBs degrade via dechlorination, resulting in build-up of the mono- and di-chlorinated congeners. Their omission from US EPA's HRA, therefore, contributed significantly to obtaining its dredging-permissive results. Indeed, when US EPA came under attack by environmental groups for favoring a dredging plan that would remove only one hundred thousand pounds of PCB, US EPA responded by adding back the mono- and di-chlorinated PCB congeners that initially had been excluded when assessing potential health risks. US EPA thereby claimed that the actual amount of PCBs that would be dredged under its "revised" plan would be one hundred fifty thousand pounds, indicating that, in US EPA's own view, the mono- and di-chlorinated congeners that were omitted from the baseline HRA would contribute 50 percent more than the one hundred thousand pounds of PCB actually included in the inventory on which the HRA was based (Michaels and Oko 2007).

We conclude that US EPA estimation of mobilization of dredge-disturbed PCB-contaminated sediment has been grossly inaccurate. Sediment resuspension has been mismeasured and evidently not limited to within the applicable EPS of 2 percent of the amount of PCB dredged at the dredgehead. Environmental performance standards that address the broader issues of sediment mobilization and spreading to new areas of the river bottom remain nonexistent, notwithstanding peer review panel findings that such EPSs are needed. We also conclude, therefore, that any extension of the dredging project as demanded recently by many in the environmental community should be predicated upon agency remediation of these deficiencies.

## ***Issue 2, PCB mobilization: Possible PCB loss by desorption from resuspended sediment particles***

***Comparison with US EPA mobilization assumptions.*** US EPA engineering performance standards (EPSs; US EPA 2010d, 2010e) limit dredge mobilization of PCB in sediments to  $\leq 2$  percent “at the dredgehead,” which roughly is at the dredging platform. A 2010 US EPA (2010e) factsheet explicating *Technical Requirements for Phase 2 of Hudson River Dredging* states, for example:

The amount of PCBs allowed to travel down the river will not be allowed to exceed 2% of the amount of PCBs actually excavated from the river bottom, as measured at designated locations downstream of where the dredging is taking place.

As shown in Table 1 (in *Findings*), this limit routinely has been exceeded substantially, in part because measurement at downstream locations does not reflect the amount of PCB excavated at the dredgehead, and that eventually will flow down the river. Even if the 2-percent limit were not exceeded at all, however, GE estimates (Fig. 2, in *Findings*) shows that the break-even point, at which dredging will have reduced PCB mobilization as much as it has increased it during the dredging project, would be forty-six years. That is, no benefit can be expected until the year 2057 at the earliest, optimistically assuming no delays and, critically, no mobilization of PCB sediments other than resuspension.

## ***Issue 3, storms: Possibly changing frequency of sediment-mobilizing high-flow events***

The documented trend toward more frequent and more intense storms and resulting sediment mobilization (see *Findings*) can be and should be extrapolated to the future, and incorporated into Superfund remediation project assumptions, including assumptions for Hudson River PCB dredging. US EPA reported in 2011 that high river-flow caused by Tropical Storms Irene and Lee did not elevate concentrations of resuspended sediment above acceptable guidelines specified in the EPS for resuspension. However, the EPS, as already shown, dramatically underestimates PCB mobilization, and therefore constitutes a poor measure of that parameter.

When storms greatly increase river flow, uncompacted PCB sediments disturbed by dredging are scoured from the river bottom. They enter the swiftly moving water column, and are transported downstream. This downstream transport may be invisible to US EPA's EPS for resuspension because the increased river flow simultaneously dilutes the scoured sediments. This dilution reduces PCB concentrations that can be measured in river water, thereby masking the increased scouring of sediment and elevation of the rate of its downstream transport.

Swift river flow events increase downstream transport of PCB sediments to a greater degree if dredging is not suspended during their occurrence. Such episodes presumably would increase the pace of downstream contamination of water,

ecosystems, and air. US EPA's EPS for resuspension fails to measure these effects, and no EPS exists to measure the resulting increase in the area of newly contaminated river bottom. Future high-flow events, over years to decades, will continue to transport dredge-mobilized PCB sediments episodically downstream, where they will enter water, ecosystems, and air. Indeed, with sufficient dilution from increased river flow, virtually all dredge-disturbed PCB sediment conceivably could be driven downstream by storms and other high-flow events without contravening US EPA's EPS for resuspension. Thus, any extension of dredging should be predicated upon adoption of EPSs that effectively quantify and limit *long-term* scouring of dredge-disturbed sediments and resulting increases in the area of newly contaminated river bottom.

#### ***Issue 4, endangered species: Endangered species classification of Hudson River sturgeon***

In 1999, more than a decade prior to addition of the Atlantic sturgeon to the Endangered Species List, US EPA issued an addendum to its baseline ecological risk assessment for the Lower Hudson River (49). The addendum, updated in 2010, evaluated future risks posed up to the year 2018 by PCB transport from the Upper Hudson River to ecosystems in the Lower Hudson River, between the Federal Dam at Troy and the Battery in New York City. As a baseline assessment, it assumes no dredging; indeed, it assumes "the absence of remediation." Its major conclusions (US EPA 2010c, 6) include the following:

- Fish in the Lower Hudson River are at risk from future exposure to PCBs. Fish that eat other fish (i.e., which are higher on the food chain), such as the largemouth bass and striped bass, are especially at risk. PCBs may adversely affect fish survival, growth, and reproduction;
- Fragile populations of threatened and endangered species in the Lower Hudson River, represented by the **bald eagle** and **shortnose sturgeon**, are particularly susceptible to adverse effects from future PCB exposure [emphasis added];
- The future risks to fish and wildlife are greatest in the upper reaches of the Lower Hudson River and decrease in relation to decreasing PCB concentrations down river. Based on modeled PCB concentrations, many species are expected to be at risk through 2018 (the entire forecast period).

Dredging will continue to increase transport of PCBs from the Upper Hudson River to the Lower Hudson River to a degree exceeding the no-action alternative for the full forecast period. The conclusions of the *Ecological Risk Assessment Addendum*, therefore, reflect consistency of US EPA's (2010c) conclusion of record with our own: that endangered sturgeon, endangered bald eagles, and other species are at risk from continued dredging and PCB mobilization, and therefore with the general principle that environmental health is crucial for food chains and the safety of the human food supply (Hulme 2013).

Our conclusion also is consistent with that of US EPA's Hudson River PCB Dredging Peer Review Panel (2010). The panel concluded in 2010 that US EPA had failed to set an allowable sediment-loading limit, failed to gather data needed to do this, and failed to develop models to predict transport of dredge-mobilized sediment and PCB bioaccumulation based upon Hudson River hydrodynamics. Thus, US EPA sampling of resuspended PCB was insufficient, because US EPA failed to sample or model the vastly larger quantity of dredge-mobilized PCB resting on the river bottom. US EPA, therefore, cannot assure the public that transport of sediment already mobilized by dredging will not increase downstream PCB loads gradually and episodically for decades, threatening ecosystems in the Lower Hudson River. It cannot assure the public and the U.S. Department of Commerce that endangered sturgeon and bald eagles can survive decades of increased PCB transport to the Lower Hudson River. Continued dredging therefore should be predicated upon development of appropriate EPSs and compliance with them, which together might enable US EPA to make such assurances credibly.

### ***Issue 5, autism: Research into possible PCB causation of autism***

Treatment of children severely impaired by autism is palliative rather than curative; that is, children with autism typically become adults with autism (Landrigan et al. 2012). Impacts on families of children with autism may be devastating physically, psychologically, and financially. Economic impacts to society likewise are enormous (Landrigan et al. 2012; Autism Speaks n.d.), and may be exacerbated since the American Psychiatric Association in 2013 changed its diagnostic mental illness definitions, combining people with severe autism and others with milder forms (such as those with Asperger's Syndrome) into a single autism spectrum disorder (ASD) category (Jabr 2012).

The issue of whether the officially completed GE Hudson River dredging project should be extended to remediate remnant PCBs must be viewed in the context of US EPA's longstanding special mandate regarding children's health, embodied by US EPA's (2001) *Children's Health Risk Initiative*. In 1997 the Office of Children's Health Protection was instituted within US EPA. Its mission was and remains "to make children's health protection a fundamental goal of public health and environmental protection ... [by] ensuring strong standards that protect children's health."

Long-term remediation projects undertaken under the federal Superfund Act or its state equivalents are subject to five-year reviews. As dredging Hudson River PCBs was mandated in 2007, the first five-year review of the project was undertaken as required in 2012 (US EPA 2012). Accordingly, one of us (Michaels) informed US EPA of the emerging link between PCBs and possible causation of autism and, in a public comment, suggested that the scheduled five-year review address this issue relative to numerous river communities alongside the path of the dredging project. The five-year review (US EPA 2012), however, neither addressed this issue substantively, nor alluded to it. Indeed, the word *autism* was absent from the eighty-two-page report. Given the high and increasing prevalence of autism (Fig. 4; Autism Speaks

n.d.), and its seriousness, cost, and apparent linkage to environmental agents that may include maternal exposure to PCBs during pregnancy, extending the dredging project should be predicated upon satisfactory consideration of this emerging public health issue. The next five-year review of the dredging project is underway, for release in 2017.

### ***Will further clamshell dredging fulfill the purpose of dredging?***

Clamshell dredging has failed to meet US EPA's EPS goal of limiting short-term resuspension to  $\leq 2\%$  of the amount excavated. Consider a numerical illustration based upon the parameters quantified (at least approximately) earlier: 1,000 kg of PCB-contaminated sediment is excavated at the dredgehead. The EPS for resuspension is  $\leq 2$  percent, which is  $\leq 20$  kg. If 25 percent ( $\leq 250$  kg) is barged, then 75 percent ( $\leq 750$  kg) is mobilized, drastically contravening the 20-kg EPS. If, as reported orally by US EPA, 99 percent ( $750 \text{ kg} \times 0.99 = 742.5 \text{ kg}$ ) falls back to the river bottom near the dredgehead, then just 1 percent (7.5 kg) remains in the water column. If US EPA measured resuspension at the dredgehead, all of this resuspension would be captured in the measurement ( $742.5 + 7.5 = 750 \text{ kg}$ ).

A downstream measurement that is made *after* separation of the 1 percent remaining in the water column from the 99 percent falling back to the river bottom near the dredgehead would capture only the 7.5 kg remaining in the water column. The location of such a measurement, according to US EPA HUDTOX modeling, appears to be  $\geq 1,000$  m downstream. The resuspension value obtained at this location (7.5 kg in the example) complies with the EPS for resuspension (20 kg for every 1,000 kg excavated). Measuring or modeling resuspension 1,000 m downstream of dredging, therefore, in this example drastically contravenes the EPS for resuspension by overlooking 742 kg of dredge-disturbed sediment that has fallen back to the river bottom, but is still mobile (no longer buried in the riverbed).

The above numerical example also illustrates that clamshell dredging has failed to fulfill US EPA's main, original purpose of dredging: to reduce safely and substantially the long-term downstream transport of dredge-disturbed PCB sediments. The 742 kg of sediment that has fallen back to the river bottom in the above example still is mobile, in the sense that it can be and (if not redredged) eventually will be transported downstream via episodic high-flow events over years to decades. This redeposited mobile PCB sediment, as illustrated earlier, is invisible to the EPS for resuspension. The EPS, in turn, therefore is blind to long-term health and environmental risks potentially posed to downstream ecosystems.

## **Conclusion**

Any long-term project, especially if unusually expensive, must be evaluated periodically to assess the degree to which it is fulfilling its purpose. If it is not fulfilling its purpose, it must be redesigned or terminated. Clamshell dredging was and remains a

bad idea for the Hudson River, and has been shown incapable of fulfilling its original purpose of reducing safely and substantially the long-term downstream transport of PCBs. Our overall conclusion, therefore, is that excessive post-project PCBs in the Hudson River predominantly are attributable to sediment mobilization by clamshell dredges. We predict that proposed extension of the dredging project would prolong mobilization processes, allowing PCBs to spread widely and enter ecosystems that include people, endangered fish such as sturgeon, and endangered birds such as bald eagles.

**Recommendations.** We recommend that the design of any extended or future PCB dredging be improved to comply with US EPA's EPS limiting *short-term* resuspension to  $\leq 2$  percent of PCB in sediment excavated, and adopt EPSs also limiting *long-term* downstream deposition of residual sediments outside of dredge zones. Increasing storm frequency and intensity must be incorporated into prediction of dredging-associated sediment transport. EPSs must limit transport to within levels shown sustainable for survival and reproduction of sturgeon, eagles, and other endangered species in the long-term, well beyond several years needed for completion of dredging. US EPA likewise must address the potential of dredging to increase the incidence of autism in affected river communities and, if necessary, adopt health protective EPSs. Finally, hydraulic dredging, originally proposed, should be considered as an alternative to conventional clamshells for extending and completing remediation of the Hudson River PCB Superfund Site.

### About the authors

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- . 2010e. *EPA Technical Requirements for Phase 2 of Hudson River Dredging Project, Factsheet*. [http://www.epa.gov/hudson/Hudson\\_Phase\\_2\\_Fact\\_Sheet.pdf](http://www.epa.gov/hudson/Hudson_Phase_2_Fact_Sheet.pdf) (accessed March 29, 2017).
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# EPA Second Draft Year Review

Checko Miller [REDACTED]

Mon 8/21/2017 3:30 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I have long lived in Ulster County that shares a shore line with the Hudson River that was recklessly contaminated with toxic PCBs by GE. The level of PCBS is still too high and the responsibility of the EPA is to hold GE accountable and to further dredging in order to restore the river—particularly the lower Hudson that is vital to the local economy and recreational enjoyment of so many communities.

Your report cannot accept that the "remedy is protective" given the facts and levels of contamination that still exist. Your job and responsibility to this nation is to protect and restore our environment, for "the people" of today and the future—not those companies that have polluted our natural resources and endangered all our lives.

You had best have your personal legacy to be an American who is a "Restorer", not a "Destroyer."

Sincerely,

Checko Miller  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Checko Miller [REDACTED]

Fri 9/1/2017 2:10 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

The clean up of G.E.'s contamination of the Hudson River must continue. The EPA has a sworn duty, legally and morally, to protect and preserve the environment now and for future generations. The agency must hold accountable those companies and persons responsible for threatening and endangering human lives and the life forms that exist in this river. For much of the area's citizens' lifetime, the contamination of the river has denied them their inalienable rights by threatening and diminishing their life, liberty, and pursuit of happiness to experience the many values of the Hudson River. It is your responsibility to make right that grievous wrong.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Checko Miller  
[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Patricia Miller [REDACTED]

Mon 8/21/2017 3:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Please fight to complete the clean up of PCBs from the Hudson River. The poison will hurt our citizens & local ecology. Currently the project is being dropped because the EPA is not informing the clean up ruling. This remedy is not protective.

Clean up our beautiful river.

Sincerely,

Patricia Miller

[REDACTED]  
[REDACTED]  
[REDACTED]

# Hudson river dredging.

Scott Miller [REDACTED]

Mon 7/17/2017 7:41 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

If more dredging is indicated for the Hudson river, I suggest that NYS taxpayers foot the bill – it was NYS that permitted the dumping. Personally, I think the money would be way way better spent on other environmental problems such as old municipal combined sewer systems, habitat protection, open space and farmland and watershed protection.....

Sincerely,

Scott Miller  
[REDACTED]



Virus-free. [www.avast.com](http://www.avast.com)

Dear Director Klawinski,

I live in Hudson NY, and water helps  
my mental health. The EPA Report must  
State "the remedy is not protective", and  
EPA must remove from The report the phrase  
"the remedy will be protective". Please have  
QE do their part by doing yours.

Sincerely,

Name:

Katharine Mulbonzi

Address:

E-mail:

@



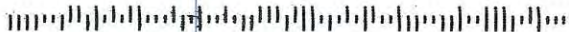
scenichudson.org/pcbs riverkeeper.org/pcbs



# #HealthyHudson

RECEIVED  
SEP 01 2017

12205-113878



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# EPA Second Draft Year Review

Giles Mitchell [REDACTED]

Fri 8/25/2017 12:50 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies. It is likely the cost of the cleanup will be far outweighed by the returns from sports fishing tourism and food industry use of local fish once the cleanup is fully completed, plus the savings in health costs as PCB toxins are no longer a threat to local residents.

Sincerely,

Giles Mitchell  
[REDACTED]  
[REDACTED]  
[REDACTED]

# Protect people and wildlife, not GE

Deidre Moderacki [REDACTED]

Tue 8/29/2017 4:40 PM

To: Gary Klawinski, Project Director, EPA <epahrfo@outlook.com>;

Aug 29, 2017

Mr. Gary Klawinski, Project Director, EPA  
US EPA Hudson River Field Office, Region 2, 187 Wolf Road, Suite 303  
Albany, NY 12205

Dear Mr. Klawinski, Project Director, EPA,

I have lived in the Hudson Valley all of my life and have the following comments on the U.S. Environmental Protection Agency's (EPA's) Proposed Second Five-Year Review Report for the Hudson River PCBs Superfund Site.

Because GE dumped over a million pounds of toxic PCBs into the Hudson River from 1947 to 1977 I expect EPA to hold GE accountable for cleaning up what they polluted.

Complexity is a denial of the simplicity of truth.

Thank you for the opportunity to submit my comments.

Sincerely,

Ms. Deidre Moderacki

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

July 25, 2017

EPA Region 2 Director Gary Klawinski  
U.S. EPA - Region 2  
187 Wolf Road, Suite 303  
Albany, NY 12005

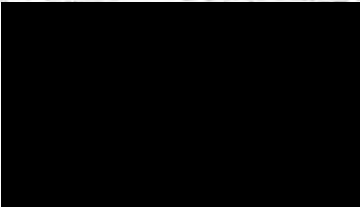
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JUL 28 2017

My name is Julian Moll-Roček and I'm a resident of Long Island. I have had the privilege of spending the past month studying in the Hudson River Valley and I am extremely concerned to learn about the state of the PCB cleanup project. As the EPA, you are charged with the protection of our National Environment. You must acknowledge that the existing condition of the Hudson is unacceptable for human health concerns and environmental quality. The Hudson remains at Superfund levels of PCBs contamination, which is not 'protective', as stated by the NY DEC. The future of the Hudson Valley is in a regenerative abundant river, where fishing, tourism, agriculture and energy innovation thrive, and our children, grandchildren, and seven generations from now can look back with gratitude at our wisdom at this critical juncture.

Sincerely,



Julian Moll-Roček



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25 JUL 17  
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EPA Region 2 Director Gary Klawinski  
U.S. EPA – Region 2  
187 Wolf Road, Suite 303  
Albany 12005

12205-113878



# FW: Hudson River PCB Cleanup

Klawinski, Gary J <Klawinski.Gary@epa.gov>

Tue 8/15/2017 2:51 PM

To: 'epahrfo@outlook.com' <epahrfo@outlook.com>;

Cc: Romanowski, Larisa <Romanowski.Larisa@epa.gov>;

-----Original Message-----

From: Carol Monteleoni

Sent: Wednesday, July 26, 2017 8:39 PM

To: Klawinski, Gary J <Klawinski.Gary@epa.gov>

Cc: info@riverkeeper.org; Pruitt, Scott <Pruitt.Scott@epa.gov>

Subject: Hudson River PCB Cleanup

Dear Mr. Klawinski,

I am writing to express my concern that more work is needed to rid the Hudson River of PCBs which endanger the health of the humans and animals who inhabit the Hudson Valley. EPA's own data show that between the Troy Dam and Manhattan, PCB concentrations in fish have not declined sufficiently. Additional dredging of the upper 40 miles of the river is needed, and the EPA must require GE to further investigate the lower 150 miles of the river to ensure that cleanup goals are met. The EPA cannot declare the cleanup complete until PCB contamination in the entire Hudson River reaches a level that does not endanger human health and the environment.

Sincerely yours,

Carol Monteleoni

July 26, 2017

Gary Klawinski  
Director, Hudson River Field Office  
US Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

RECEIVED  
AUG 02 2017

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Dear Mr. Klawinski

We urge the Environmental Protection Agency to officially state that the GE cleanup should by no means be considered finished.

We know that below the Troy dam PCB concentrations in fish have not declined as expected.

EPA must give more weight to the studies by Federal and State agencies that challenge the EPA findings.

I hope you give due consideration to the health and welfare of the affected communities.

Very truly yours,



Philip and Carol Monteleoni



Monteleone



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JUL 2007 PM 11L



Gary Klavinski  
Director, Hudson River Field Office  
US Environmental Protection Agency  
187 Wolf Rd. Suite 303  
Albany

07/28



# RE: EPA PUBLIC INPUT ON HUDSON RIVER PCB CLEANUP

Kimberly Mooers [REDACTED]

Thu 8/31/2017 11:36 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Cc: Manna Jo Greene <mannajo@clearwater.org>;

 1 attachments (17 KB)

EPA Klawinski 08-30-17.docx;

Dear Gary & Lisa;

I am attaching my letter regarding this issue: Hudson River and PCB continued clean up efforts.

I look forward to your response at your earliest convenience.

Sincerely,

Kimberly Mooers



Kimberly Mooers

August 30, 2017

Gary Klawinski, Director, EPA Region 2  
Hudson River Office  
187 Wolf Road, Suite 303  
Albany, NY 12205 klawinski.gary@epa.gov

Dear Mr. Klawinski;

As an everyday citizen, I have been involved with the Campaign for a Cleaner Hudson (steering committee: Clearwater, Natural Resources Defense Council, Riverkeeper, and Scenic Hudson) since its inception. I attended the Public Forum which was held at the Marist College Boathouse and was moderated by Clearwater Environmental **Director, Manna Jo Greene, in March 2013. I've attended many public forums, lobbied** on this issue at the NYS Legislature with Scenic Hudson, and helped with getting **resolutions (furthering GE's Hudson River PCB cleanup) on town board agendas.**

My purpose for writing to you is to submit input prior to the cutoff date of Friday, September 1, 2017 regarding the public comment period for PCB removal in the Hudson River.

I am of the opinion and feeling that there needs to be continued cleanup of the Hudson River with regard to PCB removal. PCB exposures are certainly not good for plant, animal and human health. They have potential to cause certain types of cancers and other degrading health illnesses.

Simply put, if humans or animals have cancer growths in them, usually, the cancer is removed in order that the living organism may possibly return to optimal health. If the cancer in living things should be removed in order to facilitate optimal **health to return, then so should the cancer causing chemicals (such as PCB's) be removed** from our river so that the river, plant, animal and human life can hopefully return to having optimal health. I think that it is plainly **wrong for the PCB's to be left in the River.**

Furthermore, the stats have changed with the discovery that many **more PCB's** were determined to exist in the river after the original ROD (2002 Record of Decision) was made. The rules of the ball game, changed, therefore, with this new evidence along with the NYSDEC report about the toxic levels in the fish, there should be a reassessment of the EPA Superfund contract with GE. I think that GE is getting away too easily. They should not be permitted to walk away from cleaning up the entire mess. They should be made to remain at the river, until the cleanup is complete. That process will most likely be forever until the end of time or the end of the earth, whichever comes first, (as per the continuous cycle of PCB removal, studies and testing).

The Hudson River, as you well know, is the largest Superfund site, ever in U.S. History. I am not satisfied with allowing GE to be excused from its responsibility of a robust and thorough PCB removal.

I understand that NYS taxpayers will be left with the bill of the cleanup now that GE is permitted to walk away. This is outrageous and unacceptable.

Will GE and other industrial corporations never stop polluting?

**On another note...if PCB's are still being used in development and manufacturing processes, IT MUST STOP! I thought PCB's were banned? Is this ban being observed by all?**

Thank you for receiving my comments and input. I look forward to your response from my inquiry and commentary.

Thank you.  
Sincerely, Ms. Kimberly Mooers

Kimberly Mooers

August 30, 2017

Gary Klawinski, Director, EPA Region 2  
Hudson River Office  
187 Wolf Road, Suite 303  
Albany, NY 12205      klawinski.gary@epa.gov

RECEIVED  
SEP 06 2017

Dear Mr. Klawinski;

Also emailed

As an everyday citizen, I have been involved with the Campaign for a Cleaner Hudson (steering committee: Clearwater, Natural Resources Defense Council, Riverkeeper, and Scenic Hudson) since its inception. I attended the Public Forum which was held at the Marist College Boathouse and was moderated by Clearwater Environmental Director, Manna Jo Greene, in March 2013. I've attended many public forums, lobbied on this issue at the NYS Legislature with Scenic Hudson, and helped with getting resolutions (furthering GE's Hudson River PCB cleanup) on town board agendas.

My purpose for writing to you is to submit input prior to the cutoff date of Friday, September 1, 2017 regarding the public comment period for PCB removal in the Hudson River.

I am of the opinion and feeling that there needs to be continued cleanup of the Hudson River with regard to PCB removal. PCB exposures are certainly not good for plant, animal and human health. They have potential to cause certain types of cancers and other degrading health illnesses.

Simply put, if humans or animals have cancer growths in them, usually, the cancer is removed in order that the living organism may possibly return to optimal health. If the cancer in living things should be removed in order to facilitate optimal health to return, then so should the cancer causing chemicals (such as PCB's) be removed from our river so that the river, plant, animal and human life can hopefully return to having optimal health. I think that it is plainly wrong for the PCB's to be left in the River.

Furthermore, the stats have changed with the discovery that many more PCB's were determined to exist in the river after the original ROD (2002 Record of Decision) was made. The rules of the ball game, changed, therefore, with this new evidence along with the NYSDEC report about the toxic levels in the fish, there should be a reassessment of the EPA Superfund contract with GE. I think that GE is getting away too easily. They should not be permitted to walk away from cleaning up the entire mess. They should be made to remain at the river, until the cleanup is complete. That process will most likely be forever until the end of time or the end of the earth, whichever comes first, (as per the continuous cycle of PCB removal, studies and testing).

The Hudson River, as you well know, is the largest Superfund site, ever in U.S. History. I am not satisfied with allowing GE to be excused from its responsibility of a robust and thorough PCB removal.

I understand that NYS taxpayers will be left with the bill of the cleanup now that GE is permitted to walk away. This is outrageous and unacceptable.

Will GE and other industrial corporations never stop polluting?

On another note...if PCB's are still being used in development and manufacturing processes, IT MUST STOP! I thought PCB's were banned? Is this ban being observed by all?

Thank you for receiving my comments and input. I look forward to your response from my inquiry and commentary.

Thank you. *Kimberly Mooers*  
Sincerely, Ms. Kimberly Mooers

# FW: PCBs in the Hudson

Klawinski, Gary J <Klawinski.Gary@epa.gov>

Tue 8/15/2017 2:52 PM

To: 'epahrfo@outlook.com' <epahrfo@outlook.com>;

Cc: Romanowski, Larisa <Romanowski.Larisa@epa.gov>;

-----Original Message-----

From: Sol Mora [REDACTED]

Sent: Wednesday, July 26, 2017 8:35 PM

To: Klawinski, Gary J <Klawinski.Gary@epa.gov>

Cc: Pruitt, Scott <Pruitt.Scott@epa.gov>

Subject: PCBs in the Hudson

Government data shows fish are inedible over the entire length of the Hudson River, from below the Troy Dam to the shores of Manhattan due to PCBs. Toxin levels in fish have not dropped despite up river dredging. This means that additional areas of river are still contaminated and additional remediation is still necessary. Probably another 40 miles of upstate river needs immediate dredging. The other 150 miles of river will need continuous monitoring over years to decades. I feel that the EPA should NOT release GE from their responsibility to clean up the entire mess that they made.

RECEIVED  
AUG 22 2017

172 Melrose Avenue  
Utica, NY 13502  
August 18, 2017

Gary Klawinski  
Director EPA Region 2, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

Dear EPA Region 2 Director Gary Klawinski,

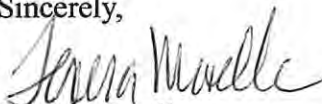
I am a resident of the Mohawk Valley. As you are aware, the Mohawk River is the largest tributary of the Hudson River. I am very concerned about the deplorable condition of the Hudson River and also its affect on the Mohawk River. When I learned that levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project, I was devastated. People are sick and tired of dumping and contamination!

The original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered (after the remedy was determined) that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected. It appears the only appropriate conclusion for these conditions is "not protective."

Why is it the residents of mid- and down-river counties, especially those who subsist on the river's fish, face the same health threats today as they did before the dredging? It is imperative you undertake action immediately in the form of a study of down-river contamination and plan for appropriate remedial action.

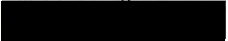
Clearly, more data is needed to determine if fish will recover in the reasonable time frames as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by NYS as well as Federal agencies.

Sincerely,

  
Teresa Morelle



Morelle & Rogers



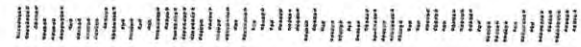
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Gary Klawinski  
Director EPA Region 2, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

12205-119878



# EPA Second Draft Year Review

David Mortimer [REDACTED]

Mon 8/28/2017 4:35 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I write you on behalf of myself and my family, which has lived in the Hudson River Valley since the mid-1880s. In 1909 we initiated Harriman State Park, which abuts the Hudson River. Three generations of family members have served as commissioners of the Palisades Interstate Park Commission--overseeing parkland along the river. Family members remain engaged with conservation organizations specifically focused on the health of the Hudson.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered--after the remedy was determined--that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Your report must not state that the remedy is protective, and further dredging must be continued in the upper Hudson. In addition, more comprehensive investigations of the contamination in the lower Hudson must be called for in your report.

Sincerely,

David H. Mortimer  
[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Eric Munson <[REDACTED]>

Mon 8/21/2017 11:45 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I live in Highland... a small town on the banks of the Hudson. Our region is defined by the river. Yet the river is poisoned. The river is unhealthy. The defining element of our geography is a farce. One can ride in it upon a boat, but no one of right mind would swim or regularly eat fish from the river. Upstate of Albany, the river is healthy. Yet, in the heart of the valley and below... it is poisoned. Man must labor to repair that which he has damaged. There is no other way. We must repair the river and restore that which we have damaged. I urge you to hold those who have contributed to its' demise the accountability to fully participate in the reparation. GE is one of the wealthiest companies on the planet. I have purchased numerous GE appliances because they were made in the USA. Hold GE (And other major polluters) accountable and make them complete the work of restoring our river to its' pristine condition it enjoyed in days of yore. We owe it to ourselves and the future generation to do so. Thank you for listening.

Sincerely,

Eric W Munson

[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Maria Muro [REDACTED]

Tue 8/29/2017 1:50 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

The report must state the remedy is not protective.

EPA must remove from the report the phrase "the remedy will be protective."

The report must call for additional dredging of PCBs in the upper Hudson.

The report must call for an investigation of contamination in the lower Hudson.

We having having lunch by the river boating on the river hiking by the river and enjoy all its beauty, I would hate to see that ruined!

My great-grandparents are right on that River my grandparents took as voting on that River my parents took is boating on the river I take my children boating on the river... don't be so sad to know that the water is contaminated and a joy, the nature, the animals, and us will not enjoy the same great experiences!

Sincerely,

Maria Muro  
[REDACTED]  
[REDACTED]  
[REDACTED]



# GE PCB Cleanup

smballplay [REDACTED]

Thu 8/31/2017 11:55 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Director Klawinski:

PCBs will never be completely removed. Hudson River fish will not be a food staple for some time. Tens of millions of gallons of raw sewage are dumped yearly into the Hudson, fix this! Cuomo wants his canals dredged for free. If GE has complied with the consent decree, they should be done!

Jay Murphy  
[REDACTED]  
[REDACTED]

# Make the Hudson Safe/Clean Again, Hold GE to Account

Sean Murray [REDACTED]

Thu 8/31/2017 6:46 PM

To: Gary Klawinski, Project Director, EPA <epahrfo@outlook.com>;

Aug 31, 2017

Mr. Gary Klawinski, Project Director, EPA  
US EPA Hudson River Field Office, Region 2, 187 Wolf Road, Suite 303  
Albany, NY 12205

Dear Mr. Klawinski, Project Director, EPA,

As a child, I lived in Tarrytown, NY from 1973-1980. Two years ago, after living in many different parts of the US and NY state, I at long last returned to the region of my cherished childhood memories. I currently live in Sleepy Hollow, NY and plan to stay for good.

Given my fond memories and future plans, I was disturbed to learn of the pollution problems in the Hudson River when I talked to members of the organization River Keeper at the local farmers' market. I was told that the PCB cleanup of the river does not protect human health and the environment, and that said cleanup is not performing as planned. I urge you to order more dredging in the Upper Hudson River, as well as a remedial investigation/feasibility study in the Lower Hudson River as soon as possible.

Sincerely,  
Sean Murray

[REDACTED]  
[REDACTED]  
[REDACTED]

Sincerely,

Mr. Sean Murray

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

# FW: Hudson River PCB cleanup

Klawinski, Gary J <Klawinski.Gary@epa.gov>

Wed 9/6/2017 9:36 AM

To: Public Comment Hudson 2nd FYR (epahrfo@outlook.com) <epahrfo@outlook.com>;

From: Judy Myers [REDACTED]  
Sent: Wednesday, August 16, 2017 8:50 AM  
To: Klawinski, Gary J <Klawinski.Gary@epa.gov>  
Subject: Hudson River PCB cleanup

Dear Mr. Klawinski,

Given the fact that the EPA's own studies below the Troy Dam show PCB concentrations in fish haven't declined as expected, additional dredging of the upper 40 miles of the Hudson River is necessary.

With more PCBs left in the river than anticipated, GE--the source of the contamination--must be required to further investigate the lower 150 miles of the Hudson River to ensure cleanup goals are met.

The EPA must give more weight to studies by federal and state agencies that challenge EPA's findings; moreover, the cleanup cannot be declared complete by the EPA until the PCB contamination in the entire Hudson River reaches a level that does not threaten human health and the environment.

Sincerely,

Judy Gelman Myers  
New York resident

# EPA Second Draft Year Review

Ana Nappa [REDACTED]

Mon 8/21/2017 4:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I grew up near the Hudson River and sailed on the River for many years. The river has been cleaned up drastically over the last 30 years. That work must be continued. I am appalled at the irresponsible actions this administration is taking. Do not poison our rivers and lakes!

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Ani Nappa  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Jonathan Nedbor [REDACTED]

Fri 9/1/2017 2:10 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am deeply concerned with the level of complacency that I see from the EPA! You are the guardians of our environment. The Hudson is still contaminated with PCBs that should not be there, that the life in the river should not be exposed to. Nor should the people who enjoy the river be at risk from GE's easy solution to their disposal problem! GE did not finish the job that is their responsibility.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Jonathan Nedbor  
[REDACTED]  
[REDACTED]  
[REDACTED]

# Hudson River Superfund 5 year review public comment

Patrick Nelson [REDACTED]

Fri 9/1/2017 2:58 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

I am writing to submit the comment that this upcoming 5 year review must declare the remedies regarding Hudson River PCB cleanup to be NOT PROTECTIVE.

EPA must listen to the New York Department of Environmental Conservation's analysis and solve this disagreement with more and better data not with heavy handed regulatory action. Declaring the remedies protective before taking the analytical steps proposed by DEC would be hasty and unwise at this point in time. The people along the banks of the Hudson River deserve to have this endeavour seen through properly and their damages repaired to the maximum possible extent.

Thank you,

Patrick Nelson

[REDACTED]

--

Patrick F. Nelson

Entrepreneur, Consultant, Musician, Political Activist, Human Being.  
B.S. Biochemistry and Biophysics: R.P.I.

[REDACTED]

[REDACTED]

# GE clean-up

Mike Newman [REDACTED]

Thu 7/6/2017 1:00 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Hello Gary,

I just wanted to email to voice my opinion that GE should be made to clean up the PCB that they've polluted the Hudson with. It's disgusting that they're trying to get out of it! I'm sure that most people in New York feel the same way.

Thank you for fighting for it!

Mike

Mike Newman  
[REDACTED]

# More dredging is needed for the Hudson

Grace Nichols [REDACTED]

Mon 8/21/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Please protect us; I live in Albany. I remember when GE was telling the world that PCBs are safe, even though in Japan and elsewhere the science was clear and PCBs had been banned. I remember what it took to get them to start dredging. But this river is a critical feature of North America. It's a place where sturgeon were the beef of the Hudson; living was easy around the Hudson; fish were plentiful; transportation was easy. It hurts to know what we did to the River. And that we have to defend the river at every turn. From oil barges, from pipelines, the nuclear power plant, from the failure of Albany to change its sewage system. We have to stay vigilant on all these issues.

When it comes to PCBs, almost done is not good enough on this job. It's persuasive to think, well, it will settle, let's just leave it there. The eagles are finally back, people have forgotten, we can get away with this.

But, I implore you to recognize the importance of what you protect. Those PCBs are persistent. They are not supposed to be there. Their effect on humans is both neurotoxic and carcinogenic. Capacitor factory workers are still dealing with Parkinson's. Mothers who ate the fish are still dealing with children who were affected. We expect increasing storms. We do not know the future. We do know that leaving those PCBs there is begging to exacerbate future disasters.

Please make GE finish the clean up. They did do it. They persisted in using PCBs when they knew what the science was saying. They have an obligation and you, my friends, have an obligation to make them do it.

Please put the river first.

Sincerely,

Grace Nichols, Disability Analyst  
[REDACTED]  
[REDACTED]  
[REDACTED]



Dear Director Klawinski,

HE needs to take responsibility for  
cleaning up the Hudson River. The PCBs  
currently upstream are traveling down  
the river & will eventually reach  
the ocean.

Sincerely,

Name:

Bob Nickel

Address:

E-mail:



**SCENIC  
HUDSON**

[scenichudson.org/pcbs](http://scenichudson.org/pcbs)



**RIVERKEEPER**

NY's clean water advocate

[riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)

# #HealthyHudson

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AUG 29 2017



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FOREVER



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# EPA Second Draft Year Review

Will Nixon [REDACTED]

Thu 8/31/2017 8:40 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I live in Woodstock, New York and often walk beside the Hudson River.

The EPA needs to insure that the PCB clean up is thorough and complete.

The remedy is not proactive.

Additional dredging is needed in the upper Hudson.

Contamination in the lower Hudson must be investigated.

Please do your job.

Will Nixon

Sincerely,

William H. Nixon

[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

I am a native of Beacon, NY and a current resident of Fishkill. Please demand that GE continue to remove PCBs from all areas of the Hudson River. Please recognize the Hudson River cleanup is "not protective."

Sincerely,

Name:

Jean Noack

Address:

E-mail:



**SCENIC HUDSON**

[scenichudson.org/pcbs](http://scenichudson.org/pcbs) [riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)



**RIVERKEEPER**  
NY's clean water advocate

# #HealthyHudson

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MAILED FROM ZIP CODE 12601

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Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# More dredging is needed for the Hudson

Wendy Nodop [REDACTED]

Mon 8/21/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

To Whom It May Concern:

My name is Wendy Nodop. I am a resident of Wallkill, NY that borders the Town of Newburgh as well as the City of Newburgh. As the Hudson River passes by these geographical areas and has / continues to serve many purposes: recreational, economic livelihoods, scenic, tourist, historic, geological features and studies--both amateur and professional educational, etc..., it is imperative that this special River, or more technically, short fjord, be protected at all costs for everyone both now and in the future. This pertains also to the flora and fauna on land, in the water and the air who interact with the River.

Please continue to require all of those who pose a threat to the Hudson River to clean it up and keep it clean from the civilians on up to the major corporations who threaten to contaminate it.

Thank you for your time and consideration in this matter.

Sincerely,

Wendy Nodop

Sincerely,

Wendy Nodop

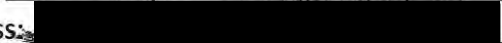
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

I'm a resident of Beacon, NY. I walk the banks of the Hudson every day. It is unacceptable that the river remain contaminated with PCBs. I ask that you remove the "will be protective" statement from the report, and recognize the Hudson River cleanup is "not protective".

Sincerely,

Name: Erica "Aic" Membrillo

Address: 

E-mail: 



**SCENIC HUDSON**

[scenichudson.org/pcbs](http://scenichudson.org/pcbs)



**RIVERKEEPER**  
NY's clean water advocate

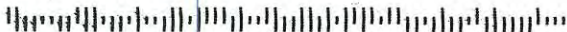
[riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)

# #HealthyHudson

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SEP 01 2017



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205





Dear Director Klawinski,

Please work to hold General Electric  
accountable for the harmful PCBs they  
knowingly dumped into our majestic Hudson  
River. Poison is poison. We cannot wait  
50 years (or more) for clean, healthy waters.

Most sincerely,

Brian Nowitzki

Sincerely,

Name:

BRIAN NOWITZKI

Address:

E-mail:



**SCENIC HUDSON**

[scenichudson.org/pcbs](http://scenichudson.org/pcbs)



**RIVERKEEPER**

NY's clean water advocate

[riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)

# #HealthyHudson

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SEP 01 2017



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MAILED FROM ZIP CODE 12601

**\$ 000.340**

AUG 29 2017

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



Dear Director Klawinski,

I am a young Hudson Valley resident ~~appalled~~  
~~am~~ alarmed that state and federal scientists do not  
agree with your draft report. I ask that you remove  
the unsubstantiated "will be protective" statements  
from the report and recognize the Hudson River  
cleanup is "not protective." It needs help!

We need support!

Sincerely,

Name: Alexis D'Brien

Address:

E-mail:



scenichudson.org/pcbs riverkeeper.org/pcbs



# #HealthyHudson

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SEP 01 2017



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# EPA Second Draft Year Review

Kathryn O'Brien [REDACTED]

Mon 8/21/2017 3:38 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

My name is Kathryn O'Brien. I live in Poughkeepsie, NY. I have been here for 30 years. When I first moved here the river and the environment around it was extremely dirty. There was no business or reason to go to the river. Today, after years of cleaning the area up, the river has become essential to the businesses around it. It's clean, beautiful and vibrant with life again. There are residents and tourists everywhere. There must be a continued effort, with the local, state and federal levels to make this river safe and clean for the future. The EPA needs to be on the front lines to make sure the efforts to clean and maintain the river continue.

Sincerely,

Kathryn O'Brien

[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Annemarie O'Connor [REDACTED]

Tue 8/22/2017 11:30 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

My name is Annemarie O'Connor. Though I have resided in CT for several years, I was born and bred in NY and many of my family members reside in the Hudson Valley and are involved in the work of Scenic Hudson. We have all been supportive of the education and advocacy efforts of the Hudson Clearwater Sloop and other environmental groups including Clean Water Action. I currently have the opportunity to work and visit some of the retreat centers along the Hudson - all of which are committed to stewardship of the environment, and most notably the Hudson River. It is imperative that efforts to clean the river of dangerous contaminants continue!

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times MORE contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Annemarie O'Connor  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

MaryAnna O'Donnell [REDACTED]

Mon 8/21/2017 3:30 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I was driving along the Hudson from Schuylerville to Hudson Falls enjoying the beauty and lamenting the fact we cannot swim in or eat the fish from this river. In my lifetime I do not expect to see a change in this if there is a cessation of studies and clean up. The dredging north of my business (Schuylerville) left the water where the dredging occurred not protective and the water south of there with elevated levels of PCBs. I am sorry but we need continued studies and most certainly mediation of this problem. GE you poison, you pay. My livelihood depends on the stability of Saratoga County. Too many youth leave the area because of the economy ... we need to keep them here! We need our water clean enough to drink, clean enough to play in and live near and certainly not something we only get to look at!

Sincerely,

MaryAnna O'Donnell

[REDACTED]  
[REDACTED]  
[REDACTED]

July 1, 2017

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JUL 06 2017

Gary Klawinski, Director  
EPA Region 2, Hudson River Office  
187 Wolf Road, Suite 303  
Albany, NY 12205

USEPA,

At the public information meeting in Poughkeepsie it was stated that PCBs bind strongly with woody debris in the river and that your models of natural attenuation suggest it will probably take more than 70 years to achieve your attenuation goal. There may be a way to increase the speed of attenuation.

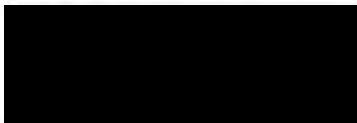
Large porous containers of sawdust could be placed throughout the OU2 region to adsorb PCBs. Because sawdust has a vastly higher surface area than natural woody debris, it should be much more efficient at binding with PCBs. After several years the containers of sawdust could be removed and replaced with fresh sawdust. Large quantities of sawdust should be available at sawmills in the northeastern US.

If the USEPA requires "proof of concept" before attempting this man-made attenuation, a nearby university or the IES might be willing to experiment with this method. This would allow small-scale experiments, done under controlled laboratory conditions, on sawdust or other "low cost sorbents". Once the concept is verified it could then be implemented, on a larger scale, in the Hudson River.

Sincerely,

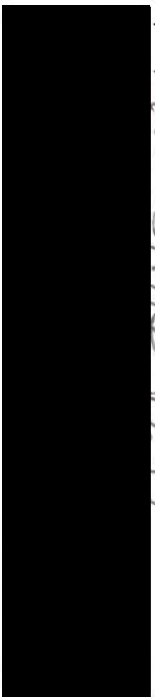
*Rick Oestrike*

Rick Oestrike, Ph.D. Geology





Kick Vestriko P17



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Gary Klawinski, Director  
EPA Region 2, Hudson River Office  
187 Wolf Road, Suite 303  
Albany, NY, 12205

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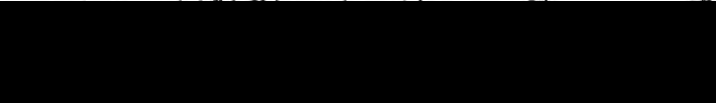


Dear Director Klawinski,

My name is Margot Olavarria and I do  
outreach for the River Project. For the 30+  
years that I have lived in N.Y., the Hudson River has been  
a vital focus of my life. I am writing to urge the EPA to clearly  
state that 'the remedy is not protective' in its final day  
of its final 5-yr. review of it, must also order more dredging  
in the upper river & begin a remedial investigation & feasibility  
study in the lower 150 miles of the Hudson River.

Sincerely,

Name: MARGOT OLAVARRIA

Address: 

E-mail: \_\_\_\_\_

Please act to remove the  
toxic PCB's from  
the river.

Thank you.



[scenichudson.org/pcbs](http://scenichudson.org/pcbs)



**RIVERKEEPER.**  
NY's clean water advocate

[riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)

# #HealthyHudson

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AUG 24 2017



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# EPA Second Draft Year Review

victoria oltarsh [REDACTED]

Tue 8/22/2017 11:10 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

The job is NOT done, by any means!!

We must continue to clean and implement best practices and methods of cleaning this precious resource. For those of us who live in river towns, it is essential for our health and well being to help the river.

We MUST clean it up!!

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

victoria oltarsh  
[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed on Hudson

Victoria Oltarsh [REDACTED]

Tue 8/29/2017 4:52 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

It is my opinion, as a long time voting Nyack resident, that we must finish the clean up and truly clean up the Hudson river which in the long run will serve the health of the river and the wild life for future generations. We should not leave the job half done and allow the PCBs from the electric company to remain. They should be pressured to help pay for the clean up.

Victoria Oltarsh  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

I am Kathryn Ornstein, new resident  
of the Hudson Valley. Please clean up  
the Hudson River for future generation.  
The EPA's final 5-yr review must clearly state  
that "the remedy is not protective."

---

Sincerely,

Name:

Kathryn Ornstein

Address:

E-mail:





scenichudson.org/pcbs



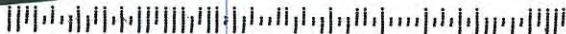
riverkeeper.org/pcbs

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SEP 01 2017



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# EPA Second Draft Year Review

Eric Ortner [REDACTED]

Tue 8/22/2017 11:30 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am a resident of Beacon, NY. I would like to swim in the Hudson River and eat fish out of the Hudson River. However, I do not feel safe doing so give that the current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

If you can't eat the fish in the river or swim in the river it is not your river. It is the company's river that polluted it. As such GE, which pays little to no taxes and uses the United State's infrastructure for profitable gain should be required to continue the clean-up operation until it is save for Hudson Valley residents to enjoy it again.

Sincerely,

Eric Ortner  
[REDACTED]  
[REDACTED]  
[REDACTED]



# EPA Second Draft Year Review

Lauree Ostrofsky [REDACTED]

Fri 9/1/2017 2:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I grew up in Hyde Park, and moved back here four years ago to be near my parents and extended family. And near this beautiful, special place.

I'm also a business owner and run the local organization, [REDACTED], with more than 1,100 members.

I remember well at [REDACTED] high school that our crew team was warned about practicing on the river. As an adult now I understand much more why parents and teachers were worried.

Twenty years later the work is not done to make this river what it could be for our communities, businesses and children to thrive.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced.

**\*\*At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.\*\***

It is clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision.

I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

We are looking for these four things to happen:

- 1) The report must state the remedy is not protective.
- 2) The EPA must remove from the report the phrase "the remedy will be protective."
- 3) The report must call for additional dredging of PCBs in the upper Hudson.
- 4) The report must call for an investigation of contamination in the lower Hudson.

Please help make this happen. Thanks for your time and support of this place we call home.

Sincerely,

Lauree Ostrofsky

[REDACTED]

[REDACTED]

[REDACTED]

# GE and Superfund

marge othrow [REDACTED]

Fri 6/9/2017 4:20 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Dear Mr. Klawinski,

The EPA's work is NOT finished in regard to all the toxins still sitting on the bottom of the Hudson river.

GE agreed to dredge & neutralize & get rid of the problem. It is not finished when professional reports indicate that it will be safe to eat on meal a week of fish from the Hudson IN 53 YEARS.

Don't let GE off the hook: make them finish the job.

Margaret Othrow

[REDACTED]

Dear Director Klawinski,

Please urge GE to finish their cleanup  
Myself and the people of the Hudson  
Valley will not tolerate the irresponsible  
behavior of their corporate actions, nor  
your administrations lack of enforcement.

Sincerely,

Name:

Carl Otto

Address:

E-mail:

@



scenichudson.org/pcbs riverkeeper.org/pcbs



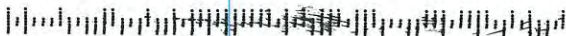
# #HealthyHudson

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SEP 01 2017



UNITED STATES POSTAGE  
PITNEY BOWES  
02 1P  
\$ 000.340  
0003173553 AUG 29 2017  
MAILED FROM ZIP CODE 12601

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# EPA Second Draft Year Review

Craig Palmer [REDACTED]

Fri 8/25/2017 1:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

My name is Craig and I reside in Nyack, NY. My family and pets swim, boat and fish in the lower Hudson River. It is unacceptable for the report to have the remedy as protective. The lower Hudson must be better tested with current data taken. The dredging should be more thorough and continue on the upper Hudson. People lives, income and futures are being negatively effected by the inadequacy of this cleanup by GE and the resultant high levels of PCB'S still being found. Please correct these I justices. I am a 3rd. Generation inhabitant of the lower Hudson Valley village of Nyack.

Sincerely,

Craig D. Palmer  
[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

John Palmer [REDACTED]

Mon 8/21/2017 11:20 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Please clean up the mess!

Sincerely,

John Palmer

[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson River

Julie Parisi [REDACTED]

Mon 8/21/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am a NYS resident, residing in Woodstock, NY. I have lived near, crossed over, boated on and even swam (before I knew it wasn't safe) in the Hudson River all of my life. Water is life. The Hudson River needs to be properly decontaminated from the PCB's GE knowingly dumped in the river. The Hudson River Superfund cleanup did not do the job it was meant to do—secure the health of the river, its wildlife and the people living along it. PCB contamination in the river remains a significant threat to public health and prosperity—as it has for nearly 80 years. GE and Monsanto knew that PCB's were a grave threat to health and they chose to pollute with them anyway. (Look up Anniston, Alabama for proof of this.)

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective".

Following its own review of the cleanup's effectiveness, the New York State Department of Environmental Conservation found, "The Remedy is not protective of human health and the environment based on uncontrolled risks, and EPA should undertake all necessary actions to ensure that the remedy becomes fully protective to the benefit of the people of New York State."

The review makes clear that PCB levels in the fish and sediment of the Lower Hudson have not benefited at all from upriver dredging. In fact, NYS DEC and the Hudson River Foundation do not expect the dredging to result in additional improvement in the Lower Hudson River.

GE must be held fully accountable for its actions. After all, according to our Supreme Court, corporations are people. If an individual did what GE has done, they would be in jail. The very least that should happen is that the cleanup should continue until the Hudson River is actually clean!

Sincerely,

Julie Parisi  
[REDACTED]  
[REDACTED]  
[REDACTED]



# More dredging is needed for the Hudson

Greg Patch [REDACTED]

Mon 8/21/2017 11:21 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am a resident of Tillson NY, part of the watershed of the Hudson Valley...

This report is not complete nor is it proactively protective with cleaning the Hudson River...

Clean waters are necessary for clean living with our populace... Water testing show contaminants like pcbs, petro chemicals and other industrial, agricultural and citizen wastes are still present at unhealthy levels for humans and the wildlife of this great waterway...

please remove such phrases in your report like "the remedy will be protective" until further testing by objective and non partisan laboratories are carried out and completely documented so proactive measures to remove these toxins are removed from the waterways of the Hudson River...

The report you offer here is not complete, nor is it objectively formulated...

Thanks You,

Greg Patch

Sincerely,

Greg Patch

[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

barbara paterson [REDACTED]

Mon 8/21/2017 11:51 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Please help to restore the Hudson River....The Mighty Hudson.....the Mohegan - The River that Runs Both Ways.....

Imagine a sparkling, clear river of water running through this valley: The delights of view...the benefits of health to all things living.

I grew up in the Hudson Valley. I have seen many improvements through the efforts of groups of concerned citizens. I think we must continue the efforts to create a society of respect for the land we live on and the natural gifts that sustain us, both physically and spiritually.

Please require General Electric, and all polluters, to clean-up the messes they have created.

Yours truly...

Sincerely,

barbara paterson  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Joy Pell [REDACTED]

Fri 9/1/2017 2:30 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I have lived in the Hudson Valley for 62 years. For all those years my family and friends have had the privilege of enjoying the Hudson River in recreational activities. It is important to me that a clear investigation of the contamination of the lower Hudson be undertaken. Additional dredging of the PCB's in the upper Hudson is necessary. We all live downstream.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective." The EPA report needs to be corrected because the state remedy is clearly not protective.

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Joy Pell  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Valerie Percy [REDACTED]

Tue 8/22/2017 11:10 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am writing as a resident of the beautiful and historic Hudson Valley, where I live with my family within 2 miles of the Hudson River. We have spent many hours hiking along its shores. Some of my most favorite moments have been spent on or next to this beautiful river, including the time I have spent rowing with local clubs.

We have been paying close attention to the dredging project. We are dismayed to hear that the project might be abandoned before results have been achieved and confirmed.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable time frames as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Please continue to work together to care for our river and our future.

Sincerely,

Valerie Percy  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

By cleaning up the Hudson and eliminating PCBs, we can comply with new business ideas and new businesses to stimulate economic growth. GE is based on an old economic model that no longer works in this age.

Sincerely,

Name: Katherine Perrino

Address:

E-mail:



scenichudson.org/pcbs riverkeeper.org/pcbs



# #HealthyHudson

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SEP 01 2017

205-113878



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0003173553 AUG 29 2017  
MAILED FROM ZIP CODE 12601

PITNEY BOWES  
\$ 000.340

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

Date: Tue May 30 14:38:52 EDT 2017  
From: Hope.Brian@epamail.epa.gov  
To: CMS.OEX@epamail.epa.gov  
Subject: FW: Hudson River PCB cleanup

---

-----Original Message-----

From: Robert Perretti [REDACTED]  
Sent: Tuesday, May 30, 2017 1:48 PM  
To: Pruitt, Scott <Pruitt.Scott@epa.gov>  
Subject: Hudson River PCB cleanup

It's years behind and still poses a long term health and safety threat. Have EPA complete the cleanup. I don't want PCBs in the river to hurt my kids and grandchildren, nor to leave them as their problem to clean up.

Robert Perretti  
[REDACTED]

Att: Mr. Gary Klawinski, Director, Hudson River Field Office, Re: EPA  
Proposed Second Five-Year Report for the Hudson River PCBs  
Superfund Site

Robert Perretti [REDACTED]

Wed 8/16/2017 12:46 PM

To: USEPA Hudson River Field Office <EPAHRFO@outlook.com>;

Dear Mr. Klawinski,

This message is email confirmation of my letter to you . Below please find the letter text:

Mr. Gary Klawinski, Director Hudson River Field Office

U.S. Environmental Protection Agency

187 Wolf Road, Suite 303

Albany, NY 12205

August 16, 2017

Dear Director Klawinski,

I am a native New Yorker who has passed years boating on and hiking along the Hudson.

After learning more about the EPA's Proposed Second Five-Year Review Report for cleanup of the Hudson River PCBs Superfund Site, I believe EPA should declare that the cleanup is not protective of human health.

The cleanup is not performing as planned. The report indicates the PCB cleanup does not currently protect the health of the public, but will in the distant future. This is misleading about as to how distant the future is. According to data collected on 2016, the average PCB concentration in fish is 1.3 mg/kg – almost 300% higher than the first remediation goal of 0.4 mg/kg. We're looking at 60 years before people can attempt even one to two meals a month of Hudson River fish.

Thanks to GE, a once vibrant fishing industry on the river no longer exists. PCB contamination has migrated south to threaten New York City. It is present in the air along the river. The Hudson is the nation's largest Superfund Site. The many people who subsist on the river's fish are slowly being killed.

None of this says, "the remedy will be protective". That phrase is wrong and should be removed from the final draft. The cleanup is not progressing as planned; much more dredging is required. The correct phrase, "the remedy is not protective" should go in its place.

Thank you for taking the time to read my letter, and for taking action per the above to protect our health.

Sincerely,



Robert Perretti

[REDACTED]

[REDACTED]

[REDACTED]

cc: Scenic Hudson, Riverkeeper, Sierra Club, Hudson River Sloop Clearwater, NY Governor Andrew Cuomo, US Senator Kristen Gillibrand, US Senator Charles Schumer, US Representative Thomas Suozzi

Mr. Gary Klawinski, Director Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

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AUG 21 2017

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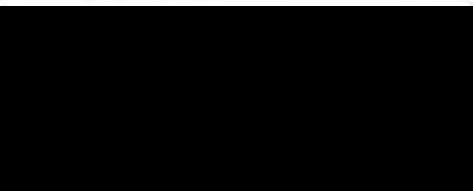
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Thank you for taking the time to read my letter, and for taking action per the above to protect our health.

Sincerely,

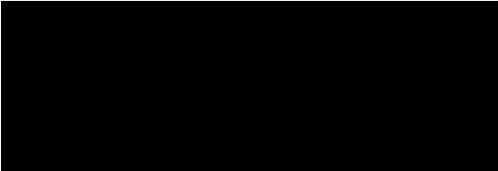


Robert Perretti



cc: Scenic Hudson, Riverkeeper, Sierra Club, Hudson River Sloop Clearwater, NY Governor Andrew Cuomo, US Senator Kristen Gillibrand, US Senator Charles Schumer, US Representative Thomas Suozzi

Handwritten notes or scribbles in the top left corner.



Handwritten text in the middle of the page, possibly a title or a line of notes.

# PCB dredging

Allison Philpott [REDACTED]

Wed 6/14/2017 1:49 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Hello Gary Klawinski,

As a concerned public citizen and as someone with a modest amount knowledge about the environment, I strongly believe that more dredging is absolutely necessary in the Hudson River. It is in my humble opinion that there are still PCBs in the Hudson not only negatively affecting the wildlife that live within it but the people that live beside it every day. We all need to know as citizens that EPA did everything it could to mitigate these circumstances, not just monitor the effects.

Thank you very much for your time,


Allison Philpott

Dear Director Klawinski,

Please, help to protect my children,  
family, and the Hudson valley community  
and ensure the Hudson River is a  
healthy and vibrant for generations to  
come. We need to continue and finish  
the clean up of the river! Don't let  
polluters off the hook.

Sincerely,

Name: Kate Phipps

Address: 

E-mail: 



**SCENIC HUDSON**

[scenichudson.org/pcbs](http://scenichudson.org/pcbs)



**RIVERKEEPER**  
NY's clean water advocate

[riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)

# #HealthyHudson

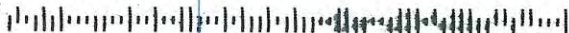
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SEP 01 2017



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MAILED FROM ZIP CODE 12601



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



Hon. Director Gary Klawinski, Director  
E.P.A. Region 2, Hudson River Office  
187 Wolf Road, Suite 303  
Albany, N.Y. 12205

Hon. Director Klawinski,

I believe on the basis of your recently completed report, that the EPA should require General Electric to do more dredging at hot spots in the Hudson river, to reduce PCB contamination.

Sincerely,

RECEIVED  
JUN 13 2011



Mr. Steven Plotnick  
[Redacted]



Mr. Steven Plotnick

ALBANY NY 120

05 JUN 2012 PM 11



Hon. Director Gary Klawinski  
EPA Region 2, Hudson River Office  
187 Wolf Road Suite 303  
Albany N.Y., 12205

12205-11979





# EPA Second Draft Year Review

philip Podmore [REDACTED]

Fri 9/1/2017 2:31 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

My family lives in the Hudson Valley, and we moved here because of all the contamination in western MA-Pittsfield has struggled to get GE to 'effectively remove HIGH levels of PCB's from the Housatonic River. Initially GE, also tried a 'minimal dredge of the river- and after years & several lawsuits were forced to clean the river bottom further afield. Their actions were too little, too late & NOT protective of the local residents.

see: <http://www.thebeatnews.org/BeatTeam/pcbs-dumped/>

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is that it was "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected. How can this FACT be dismissed as 'not important' to those of us who sail on the Hudson, fish in it's protected areas- I have no idea.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action. How can you refuse to 'revisit' the Cleanup of the Hudson River from such High levels of PCB's? The clean up of the high PCB levels in the lower Hudson Valley is imperative to the renewed 'health' of the river's native populations. WE are depending on your understanding of this fact. So, please do the required 'dredging', and once you have dredged- please test . We have no one in government watching out for our health. I call for an investigation into this PCB contamination...and how how it was permitted & by whom.

It is very clear that more data is needed to determine if fish will recover in the reasonable time frames as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

philip Podmore  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Rhonda S. Pomerantz [REDACTED]

Tue 8/22/2017 11:30 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

It is imperative that the EPA's report state that the remedy is not protective and that the EPA must remove from the report the phrase "the remedy will be protective." Also, the report must call for additional dredging of PCBs in the Upper Hudson and an investigation of contamination in the Lower Hudson.

As residents of Rockland County for nearly twenty-five years, my husband and I have spent much of our leisure time boating on the Hudson River and walking several miles along its banks in Nyack and Piermont. To help preserve our treasured quality of life in the Hudson Valley we strongly urge the EPA to protect the Hudson River and its communities to the fullest extent possible.

Sincerely,

Rhonda S. Pomerantz  
[REDACTED]  
[REDACTED]  
[REDACTED]

Tue May 30 13:38:43 EDT 2017  
Hope.Brian@epamail.epa.gov  
FW: GE PCB's - Hudson River in New York  
To: CMS.OEX@epamail.epa.gov

---

**From:** Gail Porter [REDACTED]  
**Sent:** Tuesday, May 30, 2017 1:30 PM  
**To:** Pruitt, Scott <Pruitt.Scott@epa.gov>  
**Subject:** GE PCB's - Hudson River in New York

Hi Mr. Pruitt,

I called and left a message and per your instruction I am following up with an email.

I have a [REDACTED] business in the Hudson Valley. My business and therefore my livelihood depend on the Hudson River. I am asking you to do everything you can to make GE finish the job cleaning up their mess in the Hudson River. The PCB's are still a problem and continue to affect the people who live and recreate here.

I have to tell people as we're paddling in the Hudson River that you can fish here and many people do, but you can only eat like one fish per month and pregnant women and children shouldn't eat the fish at all because of the PCB contamination. The water is fine take a swim! Would you hop in or eat a fish? Do you really think that GE deserves a pass on this?

Please give New York State lead agency status. We care about our river and know what's best. Have GE do comprehensive sampling to determine as soon as possible what more needs to be done to meet the clean- up goals. Let the numbers make your decision.

The Hudson River is our river and sometimes you only get one chance to save something. This is your one chance.

Thanks so much,

Gail Porter

[REDACTED]

[REDACTED]

Dear Director Klawinski,

Stop ignoring the science  
in favor of corporate profits!

Demand clean-up of PCB's in the  
Hudson River! Do your job  
of protecting the environment.

Sincerely,

Name:

Nicole Porto

Address:

E-mail:



scenichudson.org/pcbs riverkeeper.org/pcbs



# #HealthyHudson

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SEP 01 2017

205-113878



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

Dear Director Klawinski,

Please ~~spread~~ protect and  
promote cleanup of the Hudson  
River! Do not allow major  
corporations to avoid <sup>taking</sup> responsibility  
for harmful & toxic waste they  
produce

Sincerely,

Name: Sarah Posner

Address: \_\_\_\_\_

E-mail: \_\_\_\_\_@\_\_\_\_\_



scenichudson.org/pcbs riverkeeper.org/pcbs



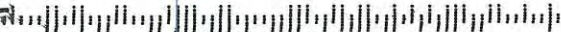
# #HealthyHudson

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MAILED FROM ZIP CODE 12601

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# EPA Second Draft Year Review

Beth Propper [REDACTED]

Tue 8/29/2017 3:10 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am writing as a NY resident and US citizen who lived on the Hudson River for over a half century. I grew up in Spuyten Divil, I reside and raise my family in Irvington NY. My schools growing up and my children's schools now focus on the Hudson as a center of science and social science education.

Current levels of contamination in fish, sediment and water are much higher than expected while the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, the EPA must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

More data are needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Beth Propper  
[REDACTED]  
[REDACTED]  
[REDACTED]



Teri Ptacek

September 1, 2017

Gary Klawinski  
Hudson River Field Office  
187 Wolf Road, Suite 303  
Albany, NY 12205

RECEIVED  
SEP 06 2017

Dear Mr. Klawinski;

I am a resident of the Town of Greenwich where I serve as the Executive Director of the Agricultural Stewardship Association, a nonprofit land trust that protects farmland in Rensselaer and Washington counties. I am also a board member of the Historic Hudson-Hoosic Rivers Partnership, a non-profit organization incorporated by the New York State Legislature representing thirty communities within the state-designated preserve.

It is my understanding that General Electric did not adequately dredge the Hudson River and significant PCB deposits remain that pose major risks to the region. The health and economic viability of river front communities continues to be compromised as a result of PCB contamination of the river, associated wetlands and floodplains. It is clear, that the remedy has not been protective of the long term or even immediate health of our river or its inhabitants.

In response to the Five-Year Review Questions:

1. Is the remedy functioning as intended by the decision documents? NO
  - a. It is clear from the initial information on habitat and fish samples that it is taking longer for recovery than anticipated. PCB's were far deeper and more dispersed than the ROD anticipated.
  - b. Habitat reconstruction has not resulted in repopulation of species within the parameters that the ROD anticipated.
  - c. Resuspension and down river redistribution of sediments into the flood plains has not been addressed.
2. Are the exposure assumptions, toxicity, data, cleanup levels, and remedial actions objections used at the time of the remedy selection still valid? NO
  - a. The variability of testing methods has tainted the results to date.
  - b. The ROD left behind significant deposits throughout the upper Hudson that are not part of the cleanup. Those deposits are in excess of standards used in other PCB cleanup projects and leave our river subject to additional cleanup costs every time we attempt a project – whether residential or public.
3. Has any other information come to light that could call into question the protectiveness of the remedy? MOST DEFINITELY YES

Teri Ptacek

- a. The original Champlain Canal was not included in the remedy and it is hydrologically part of the Hudson River. Significant PCB concentrations were found and partially removed from the canal north of Lock 5, yet the original canal was ignored. The original canal is now so silted in with blocked culverts and dead fall that it is often stagnant and overflows the banks during heavy storms.
- b. The ROD ignored the industrial and recreational use of the river when it required dredging only to the depth of the contamination – ignoring the fact that New York State has been unable to dredge to required depths for decades. Additionally, the EPA (with the ROD as an excuse) refilled areas that had silted in over the decades – impeding industrial and recreational use.
- c. The ROD focused on river sections closer to Fort Edward, ignoring contamination of the same toxicity in river sections below Lock 5. Those areas will continue to redeposit PCB's in the upper river, the flood plains and the lower river.

For these reasons, I urge the EPA to recognize that the remedy as designed is not protective. Additional dredging is required if those of us in the upper Hudson are to have a clean river. We cannot undertake projects and use our river with the knowledge that the legacy of PCB's is still lurking in the sediments and floodplains.

Sincerely yours,



Teri Ptacek

Agricultural Stewardship Association  
2531 State Route 40  
Greenwich, NY 12834

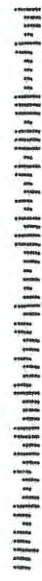


ALBANY NY 12205

01 SEP 2017 PM 11

Gary Klawidski  
Hudson River Field Office  
187 Wolf Road, Suite 303  
Albany, NY 12205

12205-113678



# Hudson River Cleanup, public comments solicited by EPA

Carmen Pujols [REDACTED]

Tue 6/27/2017 10:36 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>;  
[REDACTED]

Dear Mr. Gary Klawinski, Director  
EPA Region 2, Hudson River Office  
[187 Wolf Road, Suite 303](#)  
[Albany, NY 12205](#)

This is in response to your department's solicitation for public comments regarding the cleanup and overall health of our beautiful, unique and mighty Hudson River.

My opinion is that dredging should not only continue, but increase, to ensure the health and well-being of wildlife and human life that live in and near the Hudson River, which is one of God's great gifts to humanity that we should treasure, like all of the natural gifts bestowed on us to care for and cherish.

As a society, we must progress forward in this age that we know the filthy industrial practices of the 18<sup>th</sup> and 19<sup>th</sup> are archaic and damaging to the environment. We know better now, and we as a collective of human beings should do the best we can to resist the corruption of profit-obsessed corporations that do not care about damaging our planet. Think about your grandchildren and their quality of life. I'm old enough to remember the pollution of air and water in the 1960s and 70s. I do not relish a return to those days. Our work is not done.

We must step up our efforts to clean and protect all of our waterways. I never tire of the majestic and lyrical beauty of the Hudson River and the Hudson Valley. I feel blessed to be living here, as do my neighbors and friends. Please do everything possible to keep up the good work of keeping our River clean.

Respectfully submitted,  
Carmen Pujols  
[REDACTED]



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This is in response to your department's solicitation for public comments regarding the cleanup and overall health of our beautiful, unique and mighty Hudson River.

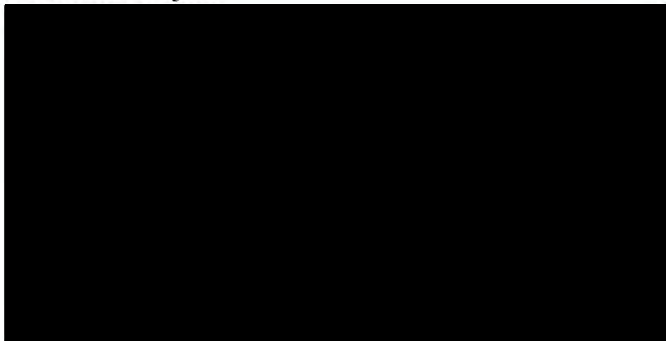
My opinion is that dredging should not only continue, but increase, to ensure the health and well-being of wildlife and human life that live in and near the Hudson River, which is one of God's great gifts to humanity that we should treasure, like all of the natural gifts bestowed on us to care for and cherish.

As a society, we must progress forward in this age that we know the filthy industrial practices of the 18<sup>th</sup> and 19<sup>th</sup> Centuries are archaic and damaging to the environment. We know better now, and we as a collective of human beings should do the best we can to resist the corruption of profit-obsessed corporations that do not care about damaging our planet. Think about your grandchildren and their quality of life. I'm old enough to remember the pollution of air and water in the 1960s and 70s. I do not relish a return to those days. Our work is not done.

We must step up our efforts to clean and protect all of our waterways. I never tire of the majestic and lyrical beauty of the Hudson River and the Hudson Valley. I feel blessed to be living here, as do my neighbors and friends. Please do everything possible to keep up the good work of keeping our River clean.

Respectfully,

Carmen Pujols



RECEIVED  
JUN 28 2017

*Hand delivered to parish keepsie*

# COMMENT SHEET - 2017 Five Year Review Report

Merrilyn Pulver [REDACTED]

Thu 8/31/2017 8:01 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Cc: Merrilyn Pulver-Moulthrop [REDACTED]

 1 attachments (14 KB)

COMMENT SHEET 2017 FIVE YEAR REVIEW.docx;

Gary Klawinski, Director  
EPA Region 2, Hudson River Office  
187 Wolf Road, Suite 303  
Albany, NY 12205

Name: Merrillyn Pulver-Moulthrop  
Organization: 5 Year Review Committee  
Address: [REDACTED]

## COMMENT SHEET – 2017 FIVE YEAR REVIEW REPORT

### COMMENTS:

In the fall of 1979, local hard-working residents and farmers (many of whom lived alongside or within sight of the river) were informed of a DEC Pilot Project to remove PCB's from a designated area from the Hudson River. It was at that time that I became involved in this long term, 37-year process, that eventually would become the largest environmental dredge project in history that would cause enormous disruptions and very little benefit to our community.

EPA said at the time that dredging would remove PCB's, but would have only a limited benefit in terms of when people could eat unrestricted amounts of fish from the river. The amount of work and disruption for very little gain made no sense.

EPA's recent review of the work shows its prediction was pretty accurate. It's been a long time since the dredging decision was made, but it is important to remember the **original goal** if you're trying to determine whether dredging was successful or not.

EPA said in its 2002 Record of Decision that ***"the selected remedy will meet the Remediation Goal for human consumption of fish.... 43 years after completion of the active remediation"*** (Pg. 106, "Hudson River PCBs Site Record of Decision"). It is also important to note that ***when EPA considered a larger project to remove more PCBs, the science showed a negligible improvement in fish, leading them to choose the remedy that was implemented*** (Pg. 102).

When the Record of Decision was released in 2002, I remember that all agencies and groups were on board, except for the local towns and villages, residents and farmers located along the 40-mile corridor to be impacted. By that time, I had become the Town Supervisor for Fort Edward. We, as a board, did what was necessary to best protect our residents, economy, our way of life. We did our best "to make lemonade out of lemons".

As I write my comments today, August 31, 2017, EPA's Five-Year Review states clearly ***"The remedy is functioning as intended, although human health and ecological goals have not yet been achieved, consistent with modeling analyses and expectations"***.

EPA also said more data is needed in the coming years to confirm the early post-dredging results. It has said that data collected over the next several years is needed to know the "rest of the story". As much as I fought against the project even coming to fruition, common sense tells me that we can't expect data from one year after the conclusion of dredging, to give us the answers.

It is my hope that EPA stands firm recognizing that science and data should direct any future decisions. It would be just wrong to base a decision on just one year of sampling after 6 years of dredging on a project that has been studied for more than 25 years!

Sincerely,

Merrilyn Pulver-Moulthrop



# EPA Second Draft Year Review

Patrick Purcell [REDACTED]

Mon 8/21/2017 4:50 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Please reconsider requiring GE to clean up the Hudson River. The river once had a fishing industry and now and for the next 50 years, the river will remain poisoned.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Patrick Purcell  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Ann Quota [REDACTED]

Wed 8/30/2017 2:22 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Director Gary Klawinski,

When I grew up on the Hudson many years ago GM and GE (as well as others) were still operating plants. The pollution from their operations made our beautiful Hudson unapproachable, smelly, and deathly the fish and animals.

The current levels of contamination in fish, sediment and water are STILL much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. Despite six years of dredging,contamination in the river is significantly higher than expected. Unacceptable.

Growing up on the river in Dobbs Ferry and Hastings, with parents from Nyack and Haverstraw, raising my kids in Ossining and Croton on Hudson, I have seen and heard first hand some of the health threats that the contaminated river and dredging cause.

At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action. It is very clear that more data is needed. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Thank you for your consideration.

Sincerely,

Ann Quota  
[REDACTED]  
[REDACTED]  
[REDACTED]

FW: Hudson River Site (DBON-AN2LTN, OPM No. 17-65, RPL No.171124)

Romanowski, Larisa <Romanowski.Larisa@epa.gov>

Tue 6/6/2017 8:33 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

---

From: Zachos, George  
Sent: Monday, June 05, 2017 6:37 PM  
To: [REDACTED]  
Subject: Hudson River Site (DBON-AN2LTN, OPM No. 17-65, RPL No.171124)

Good Evening B.R,

Thank you for your correspondence!

Your e-mail below sent this morning (June 5) was immediately forwarded to this Office for response.

Submitted on 06/05/2017 10:15AM

Submitted values are:

Name: B. R.

Email: [REDACTED]

Comments: It is imperative that the EPA Not abandon the cleanup of New York's Hudson River. Keep funding for all cleanup projects. All of our health for generations to come deoend on your moral decisios to protect us and our environment.

EPA's proposed Five Year Review report for the Hudson River PCBs Superfund site was released on June 1 for a 30-day public comment period. Your comments will be considered along with others we receive during this time.

Thank you!

Have a nice evening,

George

George H. Zachos  
Office of the Director  
Accelerated Cleanup Manager and Regional Public Liaison (formerly Superfund Ombudsman)  
[732-321-6621; toll-free, 1-888-BUDSMAN (283-7626)]

# Hudson River PCBs Superfund Site Second 5-Year Review

amparo~ [REDACTED]

Wed 8/30/2017 11:12 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Director Klawinski,

As a resident of the Hudson Valley's riverside Dutchess County, I am appalled to learn that the cleanup of PCBs/carcinogenic contaminants from the Hudson River is something we even have to fight for! This must be done for the health of our communities, wildlife, and our environment I don't see that anything more would even need to be said on such a common sense issue.

As for GE, please side with the Hudson Valley people and animals who suffer from that company leadership's willful, criminal arrogance and compel them to cleanup their toxic waste and achieve protective status for the entire 200-mile stretch of the Hudson River.

Thank you,  
Amparo Rally

[REDACTED]  
[REDACTED]  
[REDACTED]

---

Actress Tells All: "I Felt Bloated, Tired...Now I Know Why"

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# Hudson River PCBs Superfund Site Second 5-Year Review

Maria Rally [REDACTED]

Wed 8/30/2017 11:11 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Director Klawinski,

As a resident of the Hudson Valley's riverside Dutchess County, I am appalled to learn that the cleanup of PCBs/carcinogenic contaminants from the Hudson River is something we even have to fight for! This must be done for the health of our communities, wildlife, and our environment I don't see that anything more would even need to be said on such a common sense issue.

As for GE, please side with the Hudson Valley people and animals who suffer from that company leadership's willful, criminal arrogance and compel them to cleanup their toxic waste and achieve protective status for the entire 200-mile stretch of the Hudson River.

Thank you,  
Donald Rally

[REDACTED]

# FW: Hudson River Cleanup comment

Klawinski, Gary J <Klawinski.Gary@epa.gov>

Wed 9/6/2017 9:39 AM

To: 'epahrfo@outlook.com' <epahrfo@outlook.com>;

---

**From:** Dorrit Ram [REDACTED]  
**Sent:** Wednesday, August 16, 2017 9:19 AM  
**To:** Klawinski, Gary J <Klawinski.Gary@epa.gov>  
**Subject:** Hudson River Cleanup comment

Mr. Klawinski.

I urge the EPA to say in its report that GE's cleanup and the remedy to the Hudson River are not protective and more work is needed to be done by GE to ensure a healthy Hudson River.

Thank you.

Dorrit Ram

July 25, 2017

EPA Region 2 Director Gary Klawinski  
U.S. EPA - Region 2  
187 Wolf Road, Suite 303  
Albany, NY 12005

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JUL 28 2017

Dear Director Klawinski,

My name is Michael Reed and I am a Resident of Chicago, Illinois. Every year for the past 15 years I have visited the Hudson Valley to partake in learning vacations and to visit friends.

I am writing to ask you to reconsider the conclusion of your Second Draft Five-year Review of the Hudson River Superfund Project. Your final report should eliminate the unsubstantiated claim that the cleanup "will be protective." Your final must plainly state the cleanup is "not protective."

I enjoy my visits to this area and I hope to continue to do so in an unpolluted and safe environment.

Sincerely,

Michael Reed

Michael Reed

Michael Reed



ALBANY  
NY 120  
JUL 17  
PM 11



EPA Region 2 Director Gary Klawinski  
U.S. EPA – Region 2  
187 Wolf Road, Suite 303  
Albany 12005

122005-119070





ATT: Gary Klawinski

Jasrenner [REDACTED]

Thu 8/31/2017 10:41 AM

To: EPAHRFO@outlook.com <EPAHRFO@outlook.com>;

Can't believe the attention PCB's are getting since there are no proven cases of cancer related to PCB's. I worked at the disposal of PCB's for years with no health affect. If I had a ax to grind it would be with the municipalities that are dumping sewage into the river.

Thank you,  
James Renner

[REDACTED]

# EPA Second Draft Year Review

Ryan Reutershan [REDACTED]

Fri 9/1/2017 1:19 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

My name is Ryan Reutershan. I'm a [REDACTED] resident of Kingston, New York. I grew up in Cornwall, NY, so the Hudson River has always been a part of my life. Upon hearing that your organization is considering settling for unaccomplished efforts to remove PCBs from the river, I am concerned and disheartened.

My generation yearns to know a Hudson River that is clean and bountiful. We have admired the physical beauty of this waterway our whole lives, but it is an admiration incomplete. We envision a river that can feed our communities, literally and economically; a river that can enhance our future if we choose to stay here.

We are all held accountable for our mistakes in life, and this trial should be no different. Please continue action to ameliorate the situation.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Thank you sincerely for your time and consideration,  
Ryan Reutershan

[REDACTED]

Sincerely,

Ryan Reutershan

[REDACTED]  
[REDACTED]  
[REDACTED]

Re: The Hudson has not been made protective  
Dear Director Klawinski, and more work must be done

I am a resident of Cornwall, NY. We love  
our river + need the GE PCBs to be cleaned up  
for our wellbeing + our ecology. The EPA  
report must say that the cleanup is "not yet  
protective" because the PCBs are still there,  
fish tissue still has it + the lower river hasn't  
improved.

Change the Hudson cleanup report to admit  
the truth that it is not yet protective.  
and order more remediation!

Sincerely,

Name: Heidi Reyes

Address:

E-mail:

thank you.

@



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NY's clean water advocate

[scenichudson.org/pcbs](http://scenichudson.org/pcbs) [riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)

# #HealthyHudson

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AUG 15 2017

Glacier Bay National Park & Preserve



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# More dredging is needed for the Hudson

Michele Riddell [REDACTED]

Mon 8/21/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am Michelle Riddell from the Hudson Valley I've been swimming at Kingston Point and boating canoeing . Please clean up the hudson now!!!! And please write in your report EPA please state that the remedy is not protective so that we get the job done well please get back to me Michelle Riddell [REDACTED]

Sincerely,

Michelle Riddell  
[REDACTED]  
[REDACTED]  
[REDACTED]

**COMMENT SHEET — 2017 Five Year Review Report**  
**Hudson River PCBs Superfund Site**

Name (Please Print):

Michael Riggio

Agency/Organization:

Address:

Home address —

Written comments must be postmarked by September 1, 2017

COMMENTS:

With regard to the Old Champlain Canal, I believe it is necessary to test for PCB's since it is part of the river system with the Hudson feeding it directly, and it should be part of the clean-up program. Since the canal system may have contaminated soil, it prevents the support of other agencies to maintain it. This presents the village with a problem of stagnant waters along a historic waterway used by many for entertainment.

I believe the EPA should step-up to responsibility which is to ensure this waterway is safe.

Thank you for your consideration

Written Comments can be sent by mail or email to:

Gary Klawinski, Director  
EPA Region 2, Hudson River Office  
187 Wolf Road, Suite 303  
Albany, NY 12205  
email: epahrfo@outlook.com



Mr. Michael F. Riggio

HARTFORD CT 061

29 AUG 2017 PM 7 L



Gary Klawinski  
Director

EPA Region 2, Hudson River Ofc.  
187 Wolf Road, suite 303  
Albany NY 12205

12205-113878



# EPA Second Draft Year Review

Dennis Riley [REDACTED]

Tue 8/22/2017 11:10 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

My family and I live in Catskill, NY and I have enjoyed kayaking on the Hudson River for over two decades both in the mid-Hudson Valley and around New York City. I am extremely concerned that the EPA will issue a misleading and erroneous report relative to the current levels of PCB contamination and the impact of dredging on the health of the river. The current draft technical review fails in the EPA's stated mission to protect the environment in several key areas.

It is imperative that as part of the technical review:

1. The report must state the remedy is not protective.
2. The EPA must remove from the report the phrase "the remedy will be protective."
3. The report must call for additional dredging of PCBs in the upper Hudson.
4. The report must call for an investigation of contamination in the lower Hudson.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

I appreciate your thoughtful consideration of my views.

Sincerely,

Dennis Riley  
[REDACTED]  
[REDACTED]  
[REDACTED]



Dear Director Klawinski,

Please clean up the Hudson river, we need  
to breath clean air from it and the wild  
life needs it too also wathenev remedy  
possible the river was not like that before

Sincerely,

Name:

Andrés Rivera

Address:

E-mail:

@

RECEIVED  
U.S. DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
MONTGOMERY, ALABAMA



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AUG 29 2017

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



*David and Mary Roberts*



RECEIVED  
AUG 29 2017

August 26, 2017

Gary Klawinski  
Hudson River Field Office  
187 Wolf Road, Suite 303  
Albany, NY 12205

RE: RESPONSE TO FIVE YEAR REVIEW OF THE UPPER HUDSON DREDGING OPERATIONS

Dear Mr. Klawinski:

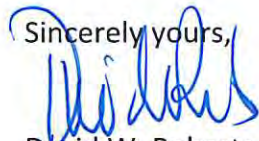
We are longtime residents of the Upper Hudson region and are often involved in activities that focus on the river. We have paid close attention to the interminable discussions about the potential clean-up needed to remove PCB's that originated at the GE plants up-stream. We have had a front row seat to the dredging operations that resulted from these discussions and court proceedings. We believe that the job is still a work in progress, to wit:

1. Is the remedy functioning as intended by the decision documents? NO
  - a. It is clear from the initial information on habitat and fish samples that it is taking longer for recovery than anticipated. PCB's were far deeper and more dispersed than the ROD anticipated.
  - b. Habitat reconstruction has not resulted in repopulation of species within the parameters that the ROD anticipated.
  - c. Resuspension and down river redistribution of sediments into the flood plains has not been addressed.
  
2. Are the exposure assumptions, toxicity, data, cleanup levels, and remedial actions objections used at the time of the remedy selection still valid? NO
  - a. The variability of testing methods has tainted the results to date.
  - b. The ROD left behind significant deposits throughout the upper Hudson that are not part of the cleanup. Those deposits are in excess of standards used in other PCB cleanup projects and leave our river subject to additional cleanup costs every time we attempt a project – whether residential or public.
  
3. Has any other information come to light that could call into question the protectiveness of the remedy? MOST DEFINITELY YES
  - a. The original Champlain Canal was not included in the remedy and it is hydrologically part of the Hudson River. Significant PCB concentrations were found and partially removed from the canal north of Lock 5, yet the original canal was ignored. The

original canal is now so silted in with blocked culverts and dead fall that it is often stagnant and overflows the banks during heavy storms.

- b. The ROD ignored the industrial and recreational use of the river when it required dredging only to the depth of the contamination – ignoring the fact that New York State has been unable to dredge to required depths for decades. Additionally, the EPA (with the ROD as an excuse) refilled areas that had silted in over the decades – impeding industrial and recreational use.
- c. The ROD focused on river sections closer to Fort Edward, ignoring contamination of the same toxicity in river sections below Lock 5. Those areas will continue to redeposit PCB's in the upper river, the flood plains and the lower river.

For these reasons – I urge the EPA to recognize that the remedy as designed is not protective. Additional dredging is required if those of us in the upper Hudson are to have a clean river. We cannot undertake projects and use of our river with the knowledge that the legacy of PCB's is still lurking in the sediments and floodplains.

Sincerely yours,  
  
David W. Roberts

  
Mary H. Roberts

*Timothy M. Roberts*

RECEIVED  
AUG 29 2017

August 26, 2017

Gary Klawinski  
Hudson River Field Office  
187 Wolf Road, Suite 303  
Albany, NY 12205

Dear Mr. Klawinski:

I am a rowing enthusiast and have been since my days in college. One of my favorite locations to practice my sport is on the beautiful stretch of flat water that is the Hudson River between locks C5 in Schuylerville and C4 in Stillwater. I have been rowing there throughout the major dredging operation that has been overseen by your office. I remain extremely concern about the remaining work that still must be done to restore this amazing resource.

In response to the Five-Year Review Questions:

1. Is the remedy functioning as intended by the decision documents? NO
  - a. It is clear from the initial information on habitat and fish samples that it is taking longer for recovery than anticipated. PCB's were far deeper and more dispersed than the ROD anticipated.
  - b. Habitat reconstruction has not resulted in repopulation of species within the parameters that the ROD anticipated.
  - c. Resuspension and down river redistribution of sediments into the flood plains has not been addressed.
  
2. Are the exposure assumptions, toxicity, data, cleanup levels, and remedial actions objections used at the time of the remedy selection still valid? NO
  - a. The variability of testing methods has tainted the results to date.
  - b. The ROD left behind significant deposits throughout the upper Hudson that are not part of the cleanup. Those deposits are in excess of standards used in other PCB cleanup projects and leave our river subject to additional cleanup costs every time we attempt a project – whether residential or public.
  
3. Has any other information come to light that could call into question the protectiveness of the remedy? MOST DEFINITELY YES
  - a. The original Champlain Canal was not included in the remedy and it is hydrologically part of the Hudson River. Significant PCB concentrations were found and partially removed from the canal north of Lock 5, yet the original canal was ignored. The

- original canal is now so silted in with blocked culverts and dead fall that it is often stagnant and overflows the banks during heavy storms.
- b. The ROD ignored the industrial and recreational use of the river when it required dredging only to the depth of the contamination – ignoring the fact that New York State has been unable to dredge to required depths for decades. Additionally, the EPA (with the ROD as an excuse) refilled areas that had silted in over the decades – impeding industrial and recreational use.
  - c. The ROD focused on river sections closer to Fort Edward, ignoring contamination of the same toxicity in river sections below Lock 5. Those areas will continue to redeposit PCB's in the upper river, the flood plains and the lower river.

For these reasons – I urge the EPA to recognize that the remedy as designed is not protective. Additional dredging is required if those of us in the upper Hudson are to have a clean river. We cannot undertake projects and use of our river with the knowledge that the legacy of PCB's is still lurking in the sediments and floodplains.

Sincerely yours,



Timothy M. Roberts

Dear Director Klawinski,

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Sincerely, *CLIFTON ROBINSON*

Name: \_\_\_\_\_  
Address: \_\_\_\_\_

E-mail: \_\_\_\_\_



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# #HealthyHudson

RECEIVED  
SEP 01 2017



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205





Dear Director Klawinski,

Please continue the clean up of the Hudson River until PCB's are gone or at safe levels. This is not only an environmental issue but important for NY economy. (NYC TO ALBANY - massive population).

Protect us and make the call.

THANK YOU.

Sincerely,

Name:

Matthew W Robinson

Address:

E-mail:



scenichudson.org/pcbs riverkeeper.org/pcbs

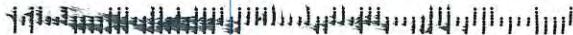


# #HealthyHudson

RECEIVED  
SEP 01 2017



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



Dear Director Klawinski,

The more you delay PCB cleanup, the more people will get sick, which will result in higher insurance premiums for everybody to the point no one will be able to afford to pay for health insurance and have access to health care, and will ultimately hurt the economy

Sincerely,

Name: Jennifer Roeder

Address: \_\_\_\_\_

E-mail: \_\_\_\_\_



**SCENIC HUDSON**

scenichudson.org/pcbs riverkeeper.org/pcbs



**RIVERKEEPER**  
NY's clean water advocate

ALBANY NY 120

29 AUG 2017



02 1P  
0003173553 AUG 29 2017  
MAILED FROM ZIP CODE 12601

# #HealthyHudson

**RECEIVED**  
SEP 01 2017

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



Dear Director Klawinski,

Why does your report state that the remedy is protected.  
Why lie? We need you to protect our human health,  
our environment. It must say the remedy is not  
protective. You know the truth, but still continue this  
nonsense. Have GE take responsibility for clean up our  
Hudson. Our River is beautiful but is a Superfund  
site, why? what are you going to do about this

Sincerely,

Name: Jessica Roman.

Address: [REDACTED]

E-mail: [REDACTED]



**SCENIC HUDSON**

scenichudson.org/pcbs riverkeeper.org/pcbs



**RIVERKEEPER**  
NY's clean water advocate

# #HealthyHudson

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SEP 01 2017



02 1P  
0003173553 AUG 29 2017  
MAILED FROM ZIP CODE 12601



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# hudson river clean-up

Christine Root [REDACTED]

Fri 9/1/2017 10:30 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Cc: Christine Root [REDACTED]

I used to swim in the Hudson river as a child in Glen's Falls NY. I would be afraid for my grandchildren to swim in the Hudson now. they are only 2 and 6 years old so they might swALLOW WATER BY MISTAKE.THE General Electric Co. has the funds but lacks the will to thoroughly clean up the Hudson. The EPA needs to nudge them to do what is right.

I have watched over my 70 years on this planet(all lived near the Hudson) as GE degenerated from a caring company into to an international corporation that cares only about profits. When I was a young woman ,it was a good company to work for. Executives were encouraged to do local community service. They came to my youth fellowship to talk to us about career planning. As an adult I watched as they everything in their power to keep from doing their duty to clean a river they had polluted. They threated, they lied and they dragged their feet. What a shame !

They need to do what is right for their employees, our community and our river.

Christine Root

[REDACTED]  
[REDACTED]  
[REDACTED]

My family has lived in this area since 1759. I care about my community.

# More dredging is needed for the Hudson

edith root [REDACTED]

Mon 8/21/2017 11:31 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I was born and raised along the magnificent Hudson River. I knew it first for it's beauty riding horses in apple orchards above it's banks , crossing in the ferry and then I became aware of the horrid offense of pollution I was a part of. Then I saw the raw sewage flow from tributaries and was ashamed at what we were doing to this beautiful reasource . Little did I know what else was happening.

Today I am aware of yet another assault on the mighty Hudson. Not only has toxic material been dumped but the 'attempt' to dredge and remove has not done the job. The remedy is not protective and there must be follow up to reach a healthy situation for all.

Sincerely,

edith root  
[REDACTED]  
[REDACTED]  
[REDACTED]



Dear Director Klawinski,

The Hudson River birthed New York.  
Its restoration is therefore critical.  
Continue to push GE to completely ~~properly~~ properly  
clean the PCBs its dumped from our  
river!

Sincerely,

Name: \_\_\_\_\_

Bruce T. Green

Address: \_\_\_\_\_

E-mail: \_\_\_\_\_



**SCENIC HUDSON**

[scenichudson.org/pcbs](http://scenichudson.org/pcbs)



**RIVERKEEPER**  
NY's clean water advocate

[riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)

NEW YORK NY 12205  
AUG 29 2017 PM 12 1



# #HealthyHudson

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AUG 29 2017

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



Dear Director Klawinski,

As a New York resident and frequent user of the glories of the Hudson River, I encourage you to prevail on General Electric to complete the job of cleaning up this magnificent river. We must consider the health and welfare of all of us.

Sincerely,

Name:

Martha Roth

Address:

E-mail:



**SCENIC HUDSON**

scenichudson.org/pcbs riverkeeper.org/pcbs



**RIVERKEEPER**

NY's clean water advocate

# #HealthyHudson

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SEP 01 2017



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Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# Hudson River PCB Cleanup Concerns

Matt Rowan [REDACTED]

Thu 7/20/2017 2:15 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Dear Mr. Klawinsk

This February, in a press conference, Scott Pruitt said, "Think about how tangible it would be to the citizens along the Hudson River, to fix that pollution. These are some of the most direct things we can do to benefit our environment. That ought to get people at the agency excited. It ought to get people in this country excited..." Well it sure did!

It is amazing how quickly that sentiment has evaporated, in the face of scientific evidence that the River is still two to four times more contaminated than was project for the conclusion of the cleanup, (please see NOAA's peer reviewed study on the remaining PCB levels in the River). The river is still the largest Superfund site in the country and to kowtow to GE would be the height of hypocrisy for your agency. I grew up on and in the River will always care deeply for the area. The Hudson is a cultural, historic, and economic linchpin for numerous communities along its banks.

Please side with these communities and their future generations in continuing the cleanup of the River and holding corporations responsible for their what at best can be called negligence.

A concerned citizen,  
Matt Rowan

# EPA Second Draft Year Review

Ann Royston [REDACTED]

Fri 9/1/2017 2:10 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

Please finish cleaning up the Hudson River! When I was a child, fish floated in oily waters at the dock at Dobbs Ferry. Now the river is recovering and becoming what it always should be, clean waters. Why wouldn't you enforce the original idea that the waters have to be cleaned by the company which polluted them?

Please continue to take care of our cherished and beautiful estuary which is and should be home to fish, birds and people. It was a jewel and a breathtaking natural wonder when Hudson sailed up it hundreds of years ago and should remain so.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Please FINISH the job!!!

Sincerely,

Ann Royston

[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Leah Rubenstein, R. N. [REDACTED]

Mon 8/21/2017 3:30 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am a resident of Woodstock NY. My family lives and plays. The Hudson River has been an important part of my life in so many ways!

Here are the points about the Hudson cleanup that must be answered!

1. The report must state the remedy is not protective.
2. EPA must remove from the report the phrase "the remedy will be protective."
3. The report must call for additional dredging of PCBs in the upper Hudson.
4. The report must call for an investigation of contamination in the lower Hudson.

Here are some special concerns I have about the report:

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective".

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties-especially those who subsist on the river's fish-face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Leah Rubenstein R. N.

[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Franz Safford [REDACTED]

Wed 8/30/2017 2:16 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

The Hudson River is a national treasure and a key component of the environment that contributes to the sustainability of human life. It was wrongfully damaged by human behavior and errors of judgement. It is therefore obligatory that we take all necessary steps to return the Hudson River to its pristine state. We have the know how and resources. We need leadership. Your leadership. It is why the EPA exists.

We look forward in the immediate future to seeing the EPA take whatever action is necessary to complete the repair of the human damage to the Hudson River.

Sincerely,

Franz K. Safford  
[REDACTED]  
[REDACTED]  
[REDACTED]



# EPA Second Draft Year Review

Donald Sagar [REDACTED]

Fri 9/1/2017 12:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable time frames as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

The prior remediation also did NOT address Dioxin contamination (which is thousands of times higher than regulation allows) or heavy metal contamination which is also prohibitive. So this superfund site is not re-mediated and needs to be looked at further with regard to what needs to be done.

Sincerely,

Don

[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Patricia Santiago [REDACTED]

Mon 8/21/2017 12:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am a resident of Wappingers Falls, NY. My family lives and plays by the Hudson River. We love boating, kayaking and swimming in the river. We need it to be CLEAN.

The Hudson River Superfund cleanup has not done the job it was meant to do—secure the health of the river, its wildlife and the people living along it. PCB contamination in the river remains a significant threat to public health and prosperity—as it has for nearly 80 years. We can not play safely in it's waters until it's clean.

The EPA needs to declare the cleanup "not protective" of human health and the environment, and additional dredging is necessary.

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered —after the remedy was determined—that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

The EPA needs to declare the cleanup "not protective" of human health and the environment, and additional dredging is necessary.

Sincerely,

Patricia Santiago  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

I implore you to hold GE  
accountable for continuing their  
PCB created Superfund site  
cleanup. They did this to my  
River. They must get it  
cleaned up.

Sincerely,

Name: Jeffrey Scales

Address: 

E-mail: 



**SCENIC HUDSON**

scenichudson.org/pcbs riverkeeper.org/pcbs



**RIVERKEEPER**

NY's clean water advocate

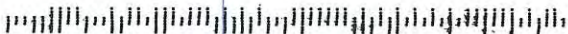
# #HealthyHudson

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SEP 01 2017



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Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# Protect the Hudson River

Lisa Scerbo [REDACTED]

Thu 8/31/2017 1:48 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

As a lifelong resident of Stillwater, NY I ask the EPA to please take more measurements and collect more data to ensure the correct decisions are made regarding the Hudson river cleanup. We have to get this right. We can't make hasty decisions that can't or won't be undone. Please don't declare the cleanup as being protective of human health and the environment. We need to conduct further study for the sake of future generations.

-Lisa Scerbo

[REDACTED]  
[REDACTED]  
[REDACTED]

Karin B Scheele



Please support  
financing to clean  
up the Hudson  
river. PCB's have  
no place in our  
waters!

Thank you!

#PostcardsfromMommy

#PostcardsforAmerica

Gary Klawinski  
EPA, Region 2 Hudson River Office  
187 Wolf Rd # 303

Albany, NY

12205

Re: Hudson River - draft Five Year Review - please continue dredging and clean up

Marilyn Donahue-Schiller [REDACTED]

Mon 7/24/2017 3:33 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Dear EPA Staff,

There needs to be continued cleanup “not protective” of human health and the environment, and that additional dredging is necessary!

Thank you,

Marilyn Schiller  
[REDACTED]

# EPA Second Draft Year Review

marian schoettle [REDACTED]

Tue 8/22/2017 11:10 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I live with my family in [REDACTED] and I established my business in [REDACTED] over 20 years ago.

Please be clear that I support the following 4 points:

The report must state the remedy is not protective.

EPA must remove from the report the phrase "the remedy will be protective."

The report must call for additional dredging of PCBs in the upper Hudson.

The report must call for an investigation of contamination in the lower Hudson.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Marian Schoettle [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]



# EPA Second Draft Year Review

Roni Schotter [REDACTED]

Wed 8/30/2017 3:10 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am a resident of Hastings-on-Hudson and am terribly upset to hear that you may be giving GE a pass and not requiring that they fully clean our river. The remedy you propose to allow is NOT adequately protective of the river and the health of all who use the Hudson--we residents of the river towns, not to mention fish and wildlife. Please remove from your report the words "the remedy will be protective." It will not be! Please insist upon further dredging for PCBs and please demand further investigation of contamination in the lower Hudson River. I urge you to do what is right and to protect our river and the health of all of us who live with it at our side! Thank you.

Sincerely,

Roni Schotter  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Penny Schoutn [REDACTED]

Mon 8/21/2017 3:30 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I have lived just 2 miles from the Hudson my whole life. My family fished, boated & swam in it. It is the heart of our region. It is reprehensible that our river, our people, our land, our animals, and our environment has been poisoned by a company that only cares about profits.

I ask:

1. The report must state the remedy is not protective.
2. EPA must remove from the report the phrase "the remedy will be protective."
3. The report must call for additional dredging of PCBs in the upper Hudson.
4. The report must call for an investigation of contamination in the lower Hudson.

Please make sure our river is truly clean & safe. Don't leave the job half done.

Thank you,

Penny Schouten

Sincerely,

Penny Schoutn  
[REDACTED]  
[REDACTED]  
[REDACTED]

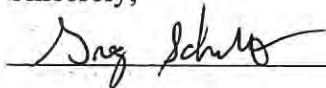
July 25, 2017

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JUL 28 2017

EPA Region 2 Director Gary Klawinski  
U.S. EPA - Region 2  
187 Wolf Road, Suite 303  
Albany, NY 12005

Hello, My name is Greg Schultz. I am a resident of Florida visiting NY. While here I have learned that the Hudson Valley/Hudson River is facing the same fate as most of the rest of the world. -I see that as being corporate privelages to exploit and trump all else. From what I can tell the PCB contamination caused by GE's unexcuseable unethical waste dumping into the Hudson has yet to be fully cleaned up, making remediation the burden of those not at fault. EPA, your final report of the Second Draft Five-Year Review of the Hudson River Superfund project must plainly state that the cleanup is "not protective" and the report should eliminate the claim that the cleanup "will be protective." Please value the health of living systems above corporate interests.

Sincerely,



Greg Schultz



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NY 120  
25 JUL '17  
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EPA Region 2 Director Gary Klawinski  
U.S. EPA – Region 2  
187 Wolf Road, Suite 303  
Albany 12005

12205-119878



# More dredging is needed for the Hudson

Phillip Schwartz [REDACTED]

Mon 8/21/2017 3:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

My name is Phillip Schwartz. I live in Hudson, NY and I love the Hudson River. I go to the waterfront every day with my dog for a walk and sometimes take out a kayak or a canoe. I want to see the complete cleanup of our great river. I want to know that there aren't PCBs or other toxins flowing in the water and harming wildlife and possibly humans. Please force GE to complete the clean up.

Phillip Schwartz

Sincerely,

Phillip Schwartz  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Annie Scibienski [REDACTED]

Mon 8/21/2017 3:30 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

We live and play on the banks of the Hudson River. It's our calming water therapy view of the world.

Your current draft states the remedy is protective. Please remove this and state clearly that the remedy is not protective.

Additional PCB cleanup is needed to improve the upper Hudson so that we can do more than look at it. We want it safe for swimming and fishing, too.

Thank you.

Sincerely,

Best world tomorrow, based on action today.

[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Nancy Sconza [REDACTED]

Mon 8/21/2017 3:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I live in Catskill, NY. The river must be cleaned up. The remedy is not protective. The EPA must remove the phrase the remedy will be protective.

The Hudson River must be dredged until it is clean. Period. The people want a clean river. Our water is precious and it must be clean.

Sincerely,

Nancy Sconza

[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Pat Sexton [REDACTED]

Mon 8/21/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

To Governor Cuomo, EPA director Gary Klawinski and EPA officials.

I am writing in support of the completion of GE's responsibility to finishing the clean up of their pollution of the Hudson River. Allowing corporations to skirt their responsibility is not an option when it affects the lives of thousands of humans and other forms of life in our local habitat. The Hudson River has been poisoned and the remediation must be complete. Allowing a half-way job is not acceptable. The EPA report must declare that the current remedy is NOT protective. I support that the EPA report must remove the statement that the current remedy will be protective. Waiting 50 years for the Hudson to be clean enough to be safe is NOT even close to satisfactory in any way, especially to those who live on, near or with the river as part of their community.

I have lived my entire adult life by the Hudson River, first in New York City and now, for the past 25 years, raising my family in Rhinebeck, NY in the mid-Hudson Valley. We treasure the time we spend by and in the Hudson River -- boating, walking, photographing, watching life on the river. It's beauty, recreational and historical significance is abundant and needs to be respected and considered. Allowing this river to be destroyed for commercial gain is repugnant. PCB levels are not yet safe and those responsible should continue to make reparation.

Thank you for considering the concerns of the people who call the Hudson Valley home. Again, please hold GE responsible for seeing the clean up to completion and do not allow the report to state that the current remedy is sufficient or will be protective. We all know that more is needed.

Thank you.

Sincerely,

Pat Sexton, [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]



# EPA Second Draft Year Review

Eric Sheflin [REDACTED]

Tue 8/22/2017 11:30 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am a resident of olivebridge,NY. I believe our collective efforts thus far have made an impact and should be continued as long as possible to return the hudson to the state it was in before this massive contamination began. I. believe it would be a shame to leave the river still quite contaminated after all this effort.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Eric Sheflin  
[REDACTED]  
[REDACTED]  
[REDACTED]

RECEIVED  
SEP 06 2017

Laurel Shute

August 31, 2017

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

Dear EPA Region 2 Director Gary Klawinski,

I am writing to evoke your patriotism for protecting and further cleaning the Hudson River, in the spirit of the Declaration of Independence. My statement is that my relationship to the Hudson River directly impacts my health and fulfillment as a citizen of the USA. I am an artist in Beacon, NY and the Hudson River environment is essential to my rights to enjoy Life, Liberty and Happiness in that the river provides me with profound inspiration. It is the ideal in the Declaration of Independence to protect the common good, all people having the right to the beauty and bounty of the Hudson River.

Further clean up is necessary, my own observation includes noticing that wildlife is struggling to survive, I see very few turtles and muskrats or river otters. I also understand that the water is often unsafe for swimming, the airborne PCB's are hard on people's lungs, and the fish can make people ill if they eat them. This struggling natural environment can be healed, this is a worthy pursuit, the beauty of the Hudson River teaches so many lessons.

Like all of us, I hope for thriving nature that is recovered for the future youth. Nature teaches and is essential for human happiness, when you watch how animals live there is growth and empathy that teaches human beings to be more appreciative of all life. People sharing nature together teach lessons in how humans can live together in greater appreciation of everyone around them.

Thank you for listening. I beg that we not only preserve what we now have with the Hudson River environment, but also strive to keep recovering the living ecosystem that was harmed by the General Electric PCB pollutants that were introduced to the river. Please pursue the total clean up of the Hudson River by following and collaborating with the careful environmental studies and solutions that Scenic Hudson and River Keeper have diligently researched and provided.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Respectfully,



Laurel Shute

Laurel Shute



ALBANY NY 120  
31 AUG 2017 PM 3:11



GARY KLAWINSKI  
DIRECTOR, HUDSON RIVER FIELD OFFICE  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY, 12205

12205-119878



# EPA Second Draft Year Review

Laurel Shute [REDACTED]

Fri 9/1/2017 2:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am writing to evoke your patriotism for protecting and further cleaning the Hudson River, in the spirit of the Declaration of Independence. My statement is that my relationship to the Hudson River directly impacts my health and fulfillment as a citizen of the USA. I am an artist in Beacon, NY and the Hudson River environment is essential to my rights to enjoy Life, Liberty and Happiness in that the river provides me with profound inspiration. At the same time, as I am near to the river I have noticed less wildlife is surviving, I see very few turtles and muskrats or river otters. I also understand that the water is often unsafe to swim in and the fish can make people ill if they eat them. This struggling natural environment can be healed, the beauty of the Hudson River teaches so many lessons. I hope for thriving nature that is recovered for the future youth. Nature teaches and is essential for human happiness, when you watch how animals live there is growth and empathy that teaches human beings to be more appreciative of all life. People sharing nature together teach lessons in how humans can live together in greater appreciation of everyone around them. Thank you for listening I beg that we not only preserve what we now have with the Hudson River environment, but also strive to keep recovering the living ecosystem that was harmed by the General Electric PCB pollutants that were introduced to the river. Please pursue the total clean up of the Hudson River by following and collaborating with the careful environmental studies and solutions that Scenic Hudson and River Keeper have diligently researched and provided.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Laurel Shute  
[REDACTED]  
[REDACTED]  
[REDACTED]

FW: Hudson River and GE

Klawinski, Gary J <Klawinski.Gary@epa.gov>

Tue 8/15/2017 2:49 PM

To: Public Comment Hudson 2nd FYR (epahrfo@outlook.com) <epahrfo@outlook.com>;

Cc: Romanowski, Larisa <Romanowski.Larisa@epa.gov>;

From: Claire Siegel [REDACTED]

Sent: Friday, July 28, 2017 11:14 AM

To: info@riverkeeper.org; Klawinski, Gary J <Klawinski.Gary@epa.gov>; Prui, Sc o <Pru.Sc o@epa.gov>

Subject: Hudson River and GE

Sir,

Respected scientific and environmental organizations have concluded that the cleanup of the Hudson by GE is incomplete.

The pollution that they caused is still harmful to the river, the land around it, wildlife, and human beings.

It is your responsibility to force GE to own their responsibility and return this resource to a place where life can flourish

Respectfully,

Claire Siegel  
[REDACTED]

# Protect people and wildlife, not GE

Bena Silber [REDACTED]

Fri 9/1/2017 3:47 PM

To: Gary Klawinski, Project Director, EPA <epahrfo@outlook.com>;

Sep 1, 2017

Mr. Gary Klawinski, Project Director, EPA  
US EPA Hudson River Field Office, Region 2, 187 Wolf Road, Suite 303  
Albany, NY 12205

Dear Mr. Klawinski, Project Director, EPA,

I live in Poughkeepsie in the Hudson River valley. The health and safety of the river is crucial to our Hudson River communities. We live so close to the river; we get our drinking water from the river; we depend on the river's health for our local economies. Tourism is important for our businesses. The contamination of the river was worse than expected and the clean up to date has not met it's original goals. We need a clean river for our personal and economic health. Please require GE to continue cleaning up the river and meet the original cleanup goals rather than a percent of the contamination.

Thank you,  
Bena Silber

[REDACTED]  
[REDACTED]

Sincerely,

Ms. Bena Silber

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

RECEIVED  
AUG 02 2017

July 26, 2017.


Dear Mr. Klawnsky.

Regarding the Hudson River PCB cleanup, the current plan is insufficient; it leaves several times more PCB's in the river than tolerable. This is evidenced by tests of fish.

It is the responsibility of GE who caused this disaster, and they need to be held accountable. Obviously, additional dredging of the upper river is needed, and the lower river should be further tested to ensure the cleanup goals are met.

Thank you for your consideration, and the work you do to protect our environment.

Sincerely,  
Shenill Silver





Sherrill Silver



ALBANY NY 120

27 JUL 2017 PM 2 L



Gary Klawnsky  
Dir. Hudson River Field Office  
US Environmental Protection Agency

07/28 [Postnet barcode]

[Postnet barcode]



# More dredging is needed for the Hudson

Donna Simms [REDACTED]

Mon 8/21/2017 3:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am a resident of Troy, New York; and I love our beautiful Hudson River. The EPA's 5 year technical review must be honest and state clearly that the remedy of partial dredging is not protective and will never be protective until the PCB's with which GE contaminated our river are removed. It is an insult to New Yorkers to leave the river so badly contaminated so that those who use it are poisoned.

I beg you to be responsible and require GE to finish the job of removing its toxic waste from the people's river.

Sincerely,

Donna Simms

[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

Please help GE to be responsible  
with the continuance of their clean-up  
of our lovely Hudson River! The EPA  
needs to review / revise their report.

Sincerely,

Name: Marianne Siniopken

Address: 

E-mail: 



**SCENIC  
HUDSON**

[scenichudson.org/pcbs](http://scenichudson.org/pcbs) [riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)



**RIVERKEEPER**  
NY's clean water advocate

ALBANY NY 1220

25 AUG 2017 PM 2:1



# #HealthyHudson

**RECEIVED**  
AUG 29 2017

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



Dear Director Klawinski,

We must clean up the river

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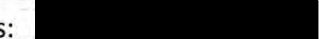
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Sincerely,

Name: Joanne Siavo

Address: 

E-mail: 



scenichudson.org/pcbs



riverkeeper.org/pcbs

# #HealthyHudson

RECEIVED  
SEP 01 2017



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# EPA Second Draft Year Review

Donald Smith, MD [REDACTED]

Tue 8/22/2017 11:30 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable time frames as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

This level of contamination, although partially corrected must be improved. Our community wants improvement demanded now and not some unknown time in the future. EPA is the only agency that can effectively push harder for this in a timely manner. Please do so.

Sincerely,

DonaldA.Smith, MD MPH Prof Medicine, ISMMS

[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

mark smith [REDACTED]

Mon 8/21/2017 11:30 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Let's finish the job!

GE knew what they were doing....after all they have many scientists on staff...,duh!

Sincerely,

mark smith

[REDACTED]  
[REDACTED]  
[REDACTED]

July 25, 2017

EPA Region 2 Director Gary Klawinski  
U.S. EPA - Region 2  
187 Wolf Road, Suite 303  
Albany, NY 12005

RECEIVED  
JUL 28 2017

EPA,

Your final reports' claim that the PCB cleanup in the Hudson river is complete is unsubstantiated. You have blatantly ignored what current science has to ~~to~~ say about the "protective" levels of PCBs left in the river, as well as what "protective" actually means in this case. We all wonder how such corporations can live with themselves when they are causing direct harm to the world THEY & THEIR FAMILIES have to live in. Stop turning a blind eye to the world in the name of profits. There are still dangerous levels of PCBs in the Hudson river. If I know it, you know it. Go back, do it right, buy one less vacation for your CEO, and make sure that the people, wildlife, and ecosystems in the Hudson Valley are safe. Safe meaning that you ACTUALLY CHECKED THE ENTIRE RIVER - not estimated PCB levels through faulty, outdated statistical analysis that slant the data toward your profit.

Sincerely,

Maul Jule

(Should go without saying.)



Marie Snyder



ALBANY  
NY 120  
25 JUL '17  
PM 11



EPA Region 2 Director Gary Klawinski  
U.S. EPA – Region 2  
187 Wolf Road, Suite 303  
Albany 12005

12205-119878



# More dredging is needed for the Hudson

Sara Sogut [REDACTED]

Mon 8/21/2017 11:51 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am a New Paltz resident and I love the nature of the Hudson Valley and New York. As a child I lived in Brooklyn, and we could fish from the pier and eat what we caught. Now I have grand children and I must tell them no, its not like you read in books. People can't fish from the waters they live around and who live around them. Corporations made this mess and they are the only ones with the means to fix it. Demand that they do, please!

The EPA needs to declare the cleanup "not protective" yet of human health and the environment, and state in its report that additional dredging is necessary! GE must finish cleaning up its mess. Dredge on!

We want to be able to walk the river bridge and look out at that lovely expanse of a river and not get a sinking feeling in the pits of our stomachs. Clean it up so it is usable and ultimately loveable!

Sincerely,

Sara Sogut  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Sara Sogut [REDACTED]

Tue 8/29/2017 5:10 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

My name is Sara Sogut. I am a grandmother living in New Paltz and working in Walkkill. When the family, my two parents, husband, two children and three grandchildren go strolling on the Walkway over the Hudson in Poughkeepsie, we discuss that the river is not yet clean; that it still contains PCBs put there by GE and yet to be removed through dredging. The kids ask all kinds of questions; essentially "are we there yet?"

The EPA draft must say that "the remedy is not protective" and remove the phrase that "the remedy will be protective." The report must call for additional dredging of PCBs in the upper Hudson and for an investigation of contamination in the lower Hudson.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Thank you for your concern, Sara

[REDACTED]  
[REDACTED]  
[REDACTED]

# Hudson River

Jessica Solomon [REDACTED]

Fri 6/2/2017 3:54 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Please continue to dredge parts of the Hudson River where PCBs are most concentrated.

Thank you

□

Protect people + wildlife, not GE

Dear Director Klawinski,

the EPA must officially declare that more  
cleanup is needed to ensure a healthy Hudson River  
because:

- From the Troy Dam to Manhattan PCBs in fish have not declined to healthy levels needed
- Additional dredging of the upper 40 miles of the Hudson river area needed to clean up the PCBs
- GE needs to take responsibility to ensure the 150 miles of the Hudson they polluted are properly cleaned up + restored ~~to~~ to be ecologically healthy
- the cleanup cannot be declared complete by the EPA (or any other federal agency) until the Hudson is again healthy for human + the environment

Sincerely,

Name: \_\_\_\_\_

Address: \_\_\_\_\_

E-mail: \_\_\_\_\_

Ms. Leola M. Specht



**SCENIC HUDSON**



**RIVERKEEPER**  
NY's clean water advocate

WESTCHESTER NY 105

07 AUG 2017 PM 1 1

[scenichudson.org/pcbs](http://scenichudson.org/pcbs) [riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)



# #HealthyHudson

**RECEIVED**  
AUG 10 2017

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



The Hudson River cleanup is "not protective" yet!

Dear Director Klawinski,

I live along the Hudson River and enjoyed swimming there as a child. My brothers caught fish & we ate them. Then it got too polluted. We need EPC to continue to clean up the PCBs they dumped into the Hudson years ago. Your report needs to accurately reflect that the Hudson River cleanup is not yet "protective" - much more needs to be cleaned up to make it safe & healthy for humans & the environment.

Sincerely,

Name: Leola Speer

Address: [REDACTED]

E-mail: [REDACTED]



**SCENIC  
HUDSON**



**RIVERKEEPER**  
NY's clean water advocate

WESTCHESTER NY 105

10 AUG 2017 PM 1 L



[scenichudson.org/pcbs](http://scenichudson.org/pcbs) [riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)

# #HealthyHudson

**RECEIVED**  
AUG 15 2017

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205





# Hudson PCB cleanup is not done

Paula Speer [REDACTED]

Mon 8/21/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

The Hudson River Superfund site cleanup so far is inadequate, failing to lower PCB contamination to acceptable levels. The upper Hudson has 3 to 5 times the contamination originally estimated, and the lower Hudson is not only unprotected but unimproved.

I live in Brooklyn, right next to the Hudson River -- but I would care about it even if I lived in Los Angeles. It is an enormously important waterway, both nationally and regionally. Please treat it as such in your report, acknowledging that the current remedy is not protective and that more dredging must be done.

Thank you.

Sincerely,

Paula Speer  
[REDACTED]  
[REDACTED]  
[REDACTED]

# Hudson River Cleanup

Judie Stahl [REDACTED]

Thu 8/31/2017 4:57 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

To Whom it May Concern:

More cleanup is needed in the Hudson River. Having recovered from [REDACTED] I am convinced that I

got it originally from having been exposed to chemicals in the beautiful river I grew up swimming in and

boating on.

Aside from the chemicals, the sewage being dumped and running into our waterways needs to stop. Make

General Electric at least finish cleaning up their toxic waste so that our future generations might once again

safely recreation in our beloved Hudson, one day safely eat the fish, and protect the river for all people and

wildlife to enjoy.

Thank you.

Judith Stahl

---

This email has been checked for viruses by Avast antivirus software.

<https://www.avast.com/antivirus>

Dear Director Klawinski,

~~THE~~ I SPENT A FAIR AMMOCENT OF  
TIME ON THE HUDSON, FISHING  
SWIMMING, PLEASE DO THE  
RIGHT THING AND, SUPPORT THE  
STATEMENTS W/ TECHNICAL  
POINTS!

Sincerely,

Name: COLIN STAIR

Address:

E-mail:



scenichudson.org/pcbs



NY's clean water advocates

riverkeeper.org/pcbs

# #HealthyHudson

RECEIVED  
SEP 01 2017



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\$ 000.34<sup>0</sup>

AUG 29 2017  
MAILED FROM ZIP CODE 12601

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# EPA Second Draft Year Review

Judy Stanley [REDACTED]

Mon 8/21/2017 4:40 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

My family has swam in and boated on the Hudson. It is one of America's great rivers. But it needs our help and further dredging in the upper Hudson and cleanup to ensure it is a safe resource for future generations.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Judy Stanley

[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Alex Stavis [REDACTED]

Mon 8/21/2017 12:04 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I implore you good people to make sure that all the PCBs are removed forms he Hudson River, and that GE pays the entire bill.

Respectfully yours,

Sincerely,

Alex Stavis

[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Alex Stavis [REDACTED]

Mon 8/21/2017 3:30 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

August 11, 2017

Dear Good People:

I implore you to do whatever you need to do to remove all PCBs from the Hudson River.

Thank you very much in advance for doing whatever is necessary to remove all PCBs from the Hudson River.

Respectfully yours,

Sincerely,

Alex Stavis  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

I am deeply concerned with our environment. I urge you to help in any way to preserve the Hudson River and remove all PVC's for the health and preservation of our very precious environment.

Sincerely,

Name:

*Maria Stearns*

Address:

E-mail:

TELETYPE UNIT





**SCENIC HUDSON**



**RIVERKEEPER**  
NY's clean water advocate

[scenicudson.org/pcbs](http://scenicudson.org/pcbs) [riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)



ADDITIONAL DUNCES · USA

# #HealthyHudson

Gary Klawinski

Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

**RECEIVED**  
AUG 14 2017



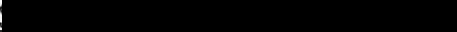
Dear Director Klawinski,

I am an environmental economics PhD Candidate at Duke  
University. I've worked on the economic benefits associated w/  
environmental protection, through tourism, real estate + healthy fisheries,  
in the Andes of Mexico, NC, Argentina, + worldwide. From my experience,  
I can say w/ certainty  
that cleaning the Hudson River will support jobs + econ. development  
for all the communities along the river, and ensure healthy communities  
for generations. Please hold GE accountable to Riley  
Clean the Hudson!

Sincerely,

Name: Stephanie Stefanski

Address: 

E-mail: 



scenichudson.org/pcbs riverkeeper.org/pcbs



# #HealthyHudson

**RECEIVED**  
SEP 01 2017



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

1205-119878



Dear Director Klawinski,

YOU ARE NOT DONE CLEANING  
UP THE HUDSON - NOT CLOSE

TALK ABOUT LOOKING DUBIOUS  
GET BACK TO WORK

Sincerely,

Name: JOE STEFKO

Address:

E-mail: \_\_\_\_\_@\_\_\_\_\_



**SCENIC  
HUDSON**

[scenichudson.org/pcbs](http://scenichudson.org/pcbs)



**RIVERKEEPER**

NY's clean water advocate

[riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)

# #HealthyHudson

RECEIVED  
AUG 21 2017



MODERN AGE ★ FOREVER/USA

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

Dear Director Klawinski,

I moved to Beacon a year ago  
and am so impressed by the parks,  
the dock and the degree to which  
people are concerned, as I am, with  
the environment. Please continue to  
improve and clean the river.

Sincerely,

Name: Evelyn Stein

Address:

E-mail:



scenichudson.org/pcbs riverkeeper.org/pcbs



# #HealthyHudson

RECEIVED  
SEP 01 2017



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# COMMENT SHEET — 2017 Five Year Review Report

## Hudson River PCBs Superfund Site

Name (Please Print): Barbara Stemke

Agency/Organization:

Address:



*Written comments must be postmarked by September 1, 2017*

COMMENTS:

ARE the EPA or NY state testing the blood or the  
TISSUES OF HUMAN BEINGS WHO WORK ON THE  
RIVER, LIVE OR PLAY ON OR NEAR the river? IS the  
TESTING CONDUCTED over a period of years, DECADES  
and will people's LEVELS OF PCB'S BE MONITORED?

ARE LEVELS OF PCB'S IN HUMANS INCLUDED <sup>IN</sup> YOUR  
CONCERNS RE: PCB remediation?

Thank you,  
B.S.

*Written Comments can be sent by mail or email to:*

Gary Klawinski, Director  
EPA Region 2, Hudson River Office  
187 Wolf Road, Suite 303  
Albany, NY 12205  
email: epahrfo@outlook.com

RECEIVED  
JUN 28 2017

Hand delivered @ Poughkeepsie



# EPA Second Draft Year Review

Fred Stern [REDACTED]

Fri 9/1/2017 12:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

My name is Fred Stern. I have lived in the town of Cortlandt for over 30 years. I am an active hiker in the Hudson Valley and love the beautiful classic views we enjoy of the Hudson River.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable time frames as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

I believe that your report should call for additional dredging of PCBs in the upper Hudson River and investigate contamination in the lower Hudson.

Sincerely,

Fred Stern  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

MaryLou Stern [REDACTED]

Tue 8/22/2017 10:00 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

These results are unacceptable and further demonstrates that the so-called remedy is not protective. Further dredging, additional removal of PCB's, is the only solution, and should be included in the report. The EPA report cannot include the term "the remedy will be protective" as this is clearly not the case.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is my understanding that research has found that, because PCB's mimic estrogen, male snapping turtles in the Hudson have withered and atrophied genitals. While most people would find fewer snapping turtles a good thing, any major impact on the population of any species indigenous to an ecosystem would create a major detrimental ripple effect.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

MaryLou Stern  
[REDACTED]  
[REDACTED]  
[REDACTED]

**COMMENT SHEET — 2017 Five Year Review Report**  
**Hudson River PCBs Superfund Site**

Name (Please Print): Eric Stiller

Agency/Organization:

Address:

Written comments must be postmarked by September 1, 2017

COMMENTS:

I have just returned from the August 9 hearing concerning the PCB Superfund project on the Hudson River. I am deeply saddened by the facts presented to us. I did not know how permeous, persistent, and expensive this environmental disaster is to this day and for the next half century at the very least. The idea that a reasonable "success" is the ability to eat one fish per week 5-6 decades from now is atrocious. far too few people know the extent of this tragedy.

We know GE is the perpetrator of what can be described as a mass killing or holocaust. They are responsible for the remediation of the Hudson and surrounding

Written Comments can be sent by mail or email to:

Gary Klawinski, Director  
EPA Region 2, Hudson River Office  
187 Wolf Road, Suite 303  
Albany, NY 12205  
email: epahrfo@outlook.com

COMMENTS:

Floodplains till it is really and truly recovered. They cannot be let off the hook on this as long as this exists.

So, it is best that GE works towards better science practices to remediate the flood damage. Dredging appears to have its limitations but may still be necessary for old or new "hotspots".

~~It~~ GE along with the EPA and any other resource, should strive for ever better remediation processes. I believe it could be argued that it would be to GE's best interests, including a better "bottom line". New <sup>PCB</sup> technologies, effectively applied and proven over time will be necessary for hundreds if not thousands of PCB contaminated waterways WORLDWIDE.

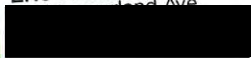
I argue that the human direct cost is currently much higher in CHINA than anywhere because the PCB load is actively discharged and millions of people are eating the fish with no idea of its effects on them and their offspring.

It is likely that a similar subgroup can be found in NYC and villages upriver where communities routinely catch and eat fish from the Hudson. I believe this is the Sleeping God's Gunilla in the room. The human pathology effect does need to be addressed, not as theory but current and near future reality.

BOTTOM LINE: GE cannot be certified and dismissed. Instead they should be made to invest in R&D toward more effective remediation methods.



Eric Stiller  
Lead Ave



DV DANIELS NJ 070

24 AUG 2017 PM 9 L



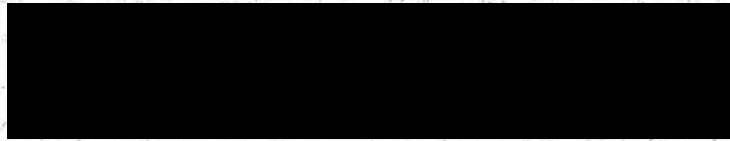
Gary Klawinski (Director)  
EPA Region 2, Hudson River Office  
187 Wolf Rd - Suite 303  
Albany, NY 12205

12205-113636



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AUG 31 2017

Julia S. Stokes



August 26, 2017

Gary Klawinski  
Hudson River Field Office  
187 Wolf Road, Suite 303  
Albany, NY 12205

Dear Gary;

I am a resident of the Town of Saratoga and walk along the Hudson River in the Towns of Saratoga and Northumberland nearly every day. For the last 15 years I have represented first the Saratoga County Chamber of Commerce and then the Schuylerville Area Chamber of Commerce on the Community Advisory Group for the Dredging of the Hudson River. For ten years I have experienced the high flows, the dredging and the moods of the river in all seasons and in all weather.

I am not a scientist and quite often have not understood the metrics described by the EPA and GE as the dredging and backfilling operations have proceeded. However, I can assure the EPA that the river did not recover immediately after stirring up the sediments. It is clear, that the remedy has not been protective of the long term or even immediate health of our river or its inhabitants.

In response to the Five-Year Review Questions:

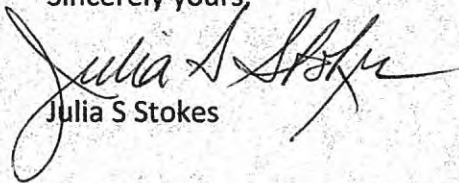
1. Is the remedy functioning as intended by the decision documents? NO
  - a. It is clear from the initial information on habitat and fish samples that it is taking longer for recovery than anticipated. PCB's were far deeper and more dispersed than the ROD anticipated.
  - b. Habitat reconstruction has not resulted in repopulation of species within the parameters that the ROD anticipated.
  - c. Resuspension and down river redistribution of sediments into the flood plains has not been addressed.
  
2. Are the exposure assumptions, toxicity, data, cleanup levels, and remedial actions objections used at the time of the remedy selection still valid? NO
  - a. The variability of testing methods has tainted the results to date.
  - b. The ROD left behind significant deposits throughout the upper Hudson that are not part of the cleanup. Those deposits are in excess of standards used in other PCB

cleanup projects and leave our river subject to additional cleanup costs every time we attempt a project – whether residential or public.

3. Has any other information come to light that could call into question the protectiveness of the remedy? MOST DEFINITELY YES
  - a. The original Champlain Canal was not included in the remedy and it is hydrologically part of the Hudson River. Significant PCB concentrations were found and partially removed from the canal north of Lock 5, yet the original canal was ignored. The original canal is now so silted in with blocked culverts and dead fall that it is often stagnant and overflows the banks during heavy storms.
  - b. The ROD ignored the industrial and recreational use of the river when it required dredging only to the depth of the contamination – ignoring the fact that New York State has been unable to dredge to required depths for decades. Additionally, the EPA (with the ROD as an excuse) refilled areas that had silted in over the decades – impeding industrial and recreational use.
  - c. The ROD focused on river sections closer to Fort Edward, ignoring contamination of the same toxicity in river sections below Lock 5. Those areas will continue to redeposit PCB's in the upper river, the flood plains and the lower river.

For these reasons – I urge the EPA to recognize that the remedy as designed is not protective. Additional dredging is required if those of us in the upper Hudson are to have a clean river. We cannot undertake projects and use of our river with the knowledge that the legacy of PCB's is still lurking in the sediments and floodplains.

Sincerely yours,



Julia S Stokes

Dear Director Klawinski,

The EPA must be honest in its pronouncements and admit that the Hudson River cleanup has not met the goals originally established and will not meet ~~the~~ its future goals. I am a mother & grandmother who lives in the Hudson valley. Even my grandchildren will be unlikely to see a clean river in their lifetimes.

Sincerely,

Name:

Barbara Sugan

Address:

E-mail:





scenichudson.org/pcbs



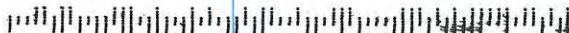
riverkeeper.org/pcbs

# #HealthyHudson

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SEP 01 2017



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



Dear Director Klawinski,

The failure of the first effort to clean  
the Hudson River is an acknowledged  
failure in meeting its protective goals.  
The next effort must truly address  
"all" the issues and develop effective  
solutions

Sincerely,

Name: Leonard Susin, PE

Address:

E-mail:



scenichudson.org/pcbs riverkeeper.org/pcbs

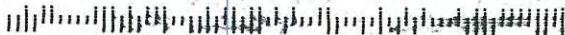


# #HealthyHudson

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SEP 01 2017



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# FW: GE must continue clean-up of Hudson River

Klawinski, Gary J <Klawinski.Gary@epa.gov>

Tue 8/15/2017 3:11 PM

To: Public Comment Hudson 2nd FYR (epahrfo@outlook.com) <epahrfo@outlook.com>;

Cc: Romanowski, Larisa <Romanowski.Larisa@epa.gov>;

-----Original Message-----

From: [REDACTED]

Sent: Sunday, June 18, 2017 8:33 PM

To: Klawinski, Gary J <Klawinski.Gary@epa.gov>

Subject: GE must continue clean-up of Hudson River

Dear Mr. Klawinski,

Protecting the environment is not a joke, not a hobby. It is the duty of individuals, companies, and governments to care for the earth. General Electric must continue its clean-up of the Hudson River. This is not about just future generations; it's about people who live here and now in the state of New York. Do NOT suspend further clean-up of the largest Superfund site in the country.

Ellen Sullivan  
[REDACTED]

Dear Director Klawinski,

It's an unfinished job! This river is NOT ready, it's not clean. GE must finish the clean up! Let's make this river clean & pure again as fast as we can!

Sincerely,

Name: James Sullivan

Address:

E-mail:





scenichudson.org/pcbs



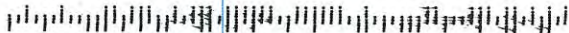
riverkeeper.org/pcbs

# #HealthyHudson

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SEP 01 2017



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# More dredging is needed for the Hudson

Marilyn Sullivan [REDACTED]

Mon 8/21/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

This is the sample message, you should customize this. this problem has been with us for years. The river should have been left alone. But for some unknown reason they had to stir the River up. Clean up the river at the source. My father was one of the people who started River keepers. He loved this river as I do . Think before you do more to destroy it.

Sincerely,

Marilyn Sullivan

[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

I am a resident of Fayetteville, NY. I live  
across the street from the Hudson, and  
knows on it. I believe EPA must declare  
the GS cleanup is NOT protective of human  
health & the environment as it is NOT performing  
as planned. I urge EPA to order more  
digging & immediately study the lower 50  
m

Sincerely,

Name: Christina Duran

Address: 

E-mail: 





**SCENIC HUDSON**

scenichudson.org/pcbs riverkeeper.org/pcbs



**RIVERKEEPER**  
NY's clean water advocate

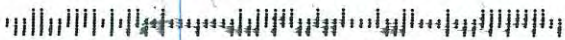
# #HealthyHudson

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Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# EPA Second Draft Year Review

Nava Tabak [REDACTED]

Wed 8/30/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am a resident of the Hudson Valley, an ecologist who studies the Hudson River estuary's tidal wetlands, and a kayaker who enjoys recreating on the river. The evidence is clear that the five year technical review of PCB cleanup in the Hudson should state that the remedy is NOT PROTECTIVE, and the phrase "the remedy will be protective" must be removed from the report. Additional dredging of PCBs is almost certainly necessary to make the river safe for future generations in the timeframe originally intended by the cleanup, along with an investigation of contamination in the lower parts of the Hudson.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

I understand that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Nava Tabak  
[REDACTED]  
[REDACTED]  
[REDACTED]

# continue dredging the Hudson to complete PCB cleanup

Linda Tafapolsky [REDACTED]

Mon 8/21/2017 11:30 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Please continue to dredge the Hudson River to complete the important work of protecting this valuable resource. I live near the Hudson, and go to the water regularly. The current level of remedy through dredging has not adequately protected the river, or those who swim and fish in it, from PCB toxicity. It is essential that the job of dredging be completed.

Sincerely,

Linda Tafapolsky

[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

constance Taft [REDACTED]

Mon 8/21/2017 11:23 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am Constance Taft, I live in Ulster County. I frequently enjoy and celebrate the beautiful mighty Hudson. As do my family, friends and the whole community. I have worked at the Clearwater Festival for over 20 years, Pete Seeger's brilliant vehicle for raising awareness of and cleaning the Hudson. It is not acceptable to allow GE to not finish cleaning up the toxins in the Hudson River !! My god, we have had this struggle once - how can his be an issue again?!?! It is reprehensible that this issue has risen again!  
**MAKE GE FINISH CLEANING THE RIVER!!!**

Constance Taft

Sincerely,

constance Taft

[REDACTED]  
[REDACTED]  
[REDACTED]

# PCB Cleanup

Silvana Tagliaferri [REDACTED]

Sun 7/2/2017 11:08 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Dear Mr. Klawinski ,

I attended the meeting in Poughkeepsie on Wed June 28 th. From the presentation given, I was made to understand that after all the time and money spent on the cleanup we are no better off (possibly worse off- as more fish than ever are dying) than when the work began.

GE has destroyed the entire river with little hope of it ever being clean again. The estimate for when fish will be edible is 70+ years.

GE must be made to continue the cleanup and find a way to restore the river to health. What is the penalty for killing such a beautiful body of water and all that surrounds it?

Sincerely,

Silvana Tagliaferri

Sent from my iPad

# Request for comments for Hudson River PCB issues

Jeff Tanenbaum [REDACTED]

Wed 8/9/2017 1:28 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Cc: pruit.scott@epa.gov <pruit.scott@epa.gov>; mannajo@clearwater.org <mannajo@clearwater.org>; marcelli@senate.state.ny.us <marcelli@senate.state.ny.us>; flanagan@nysenate.gov <flanagan@nysenate.gov>; lupinaccic@nyassembly.gov <lupinaccic@nyassembly.gov>; county.executive@suffolkcountyny.gov <county.executive@suffolkcountyny.gov>; William.Spencer@suffolkcountyny.gov <William.Spencer@suffolkcountyny.gov>; Linda.Guido@suffolkcountyny.gov <Linda.Guido@suffolkcountyny.gov>; Jennifer.Mish@suffolkcountyny.gov <Jennifer.Mish@suffolkcountyny.gov>; Elizabeth.Alexander@suffolkcountyny.gov <Elizabeth.Alexander@suffolkcountyny.gov>;

Additional CC's via their online website email comment sections to:

Senator Gillibrand

Senator Schumer

Governor Andrew M. Cuomo

Congressman Thomas Suozzi

Assemblyman Andrew P. Raia

Mr. Klawinski,

Please accept my comments regarding my insistence that the EPA get GE to fund and continue cleaning up the PCB issue created during their dumping during manufacturing. It is still mind blowing that anyone or company would knowingly dump ANYTHING in any waters or landfills that could potential poison or threaten the health of people or our little planet. This cleanup and testing must be FULLY completed as soon as possible to mitigate any further harm to our waters!

My understanding from my membership with the Clearwater Organization is that before the cleanup began in 2005, the Environmental Protection Agency knew there were significantly more PCBs beyond the area targeted for dredging, but did nothing to alter their plan. Instead they are defending a partial clean up, wishfully predicting that it will be "protective" of human health and the environment, even though two to three times more PCBs remain in the river than expected. NOAA, US Fish and Wildlife, NYS DEC and others disagree with EPA's findings. More than 80 municipalities, 161 state legislators, editorials from The New York Times and numerous regional papers, have called for more dredging.

I respectfully urge the EPA to acknowledge that the Hudson River PCB clean up, while better than no remediation, is insufficient to meet their goals of reduced PCB levels in fish, which people continue to catch and eat despite of river-wide health advisories. A much more robust remedy is needed to ensure a reasonably rapid recovery of the Hudson and to protect human health and the environment!!

Also I understand that:

- Below the Troy Dam all the way to New York City EPA's own studies show PCB concentrations in fish haven't declined as expected as a result of the upriver dredging.
- With more PCBs left in the river than anticipated, additional dredging of the upper 40 miles of the Hudson River is necessary.

- GE MUST be required to further investigate the lower 150 miles of the Hudson River to ensure cleanup goals are met.
- The EPA must give more weight to studies by federal and state agencies that challenge EPA's findings.
- The cleanup cannot be declared complete by the EPA until the PCB contamination in the entire Hudson River reaches a level that does not threaten human health and the environment.

Please understand that this not only affects the Hudson but all the waters surrounding New York City. I live on the north shore of Long Island and we absolutely feel the impact of these PCBs as the Striped Bass population is contaminated due to the spawning of the bass in the Hudson. Why in any way, is this still ongoing and being tolerated??

With highest Regards to our Environment.

Sincerely,

Jeff

Jeff Tanenbaum



Reduce. Reuse. Recycle. Please consider our environment before printing this e-mail.

This message and any attachments may contain confidential or privileged information and are intended only for the use of the intended recipients of this message. If you are not the intended recipient of this message, please notify the sender by return email, and delete this and all copies of this message and any attachments from your system. Any unauthorized disclosure, use, distribution, or reproduction of this message or any attachments is prohibited.

# EPA Second Draft Year Review

Maria-Luisa Tasayco [REDACTED]

Tue 8/29/2017 1:50 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

My family lives one block from the Hudson River and George Washington Bridge. We enjoy walking and bird watching along the beautiful Riverside grounds and in Fort Tryon Park which is just five blocks away from us. I am, as a retired scientist with a PhD in Chemistry, very concerned about any water contamination as well as any future contamination from the ongoing intent to re-industrialize the Hudson River to expedite fossil fuel exports through the port of Albany. Thus, I urge EPA to modify its report on "The Five Year Technical Review" as follows: 1) State that "the remedy is not protective" 2) Remove the phrase "the remedy will be protective" 3) Include call for additional dredging of PCBs in the upper Hudson 4) Include call for an investigation of contamination in the lower Hudson.

Sincerely,

Dr. Maria-Luisa Tasayco  
[REDACTED]  
[REDACTED]  
[REDACTED]



Dear Director Klawinski,

I have lived in the Hudson Valley for all  
30 years of my life & I have never taken  
a swim in the river that characterizes  
my hometown. I would like to do so  
before I die - please do your part &  
have GE do theirs.

Sincerely,

Name: Annabel Taylor

Address: 

E-mail: 



scenichudson.org/pcbs riverkeeper.org/pcbs



# #HealthyHudson

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SEP 01 2017

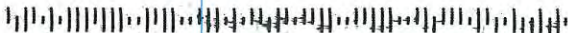
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0003173553 AUG 29 2017  
MAILED FROM ZIP CODE 12601



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# EPA Second Draft Year Review

Marie Taylor [REDACTED]

Fri 9/1/2017 12:47 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

We moved to the Hudson Valley area because we were assured that GE was being held responsible for cleaning up the mess they made. We thought that finally, people were understanding that the health of the people who live along the Hudson River should come before corporate profits. Prove us right. Make GE continue this clean-up until the river is as clean as it was before they polluted. People should always come first. Our health and the health of our children should come first. Wrongs should be made right. It won't undo the health damage the pollution has done, but just maybe, we can prevent more.

Sincerely,

Marie M. Taylor  
[REDACTED]  
[REDACTED]  
[REDACTED]

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JUL 28 2017

July 25, 2017

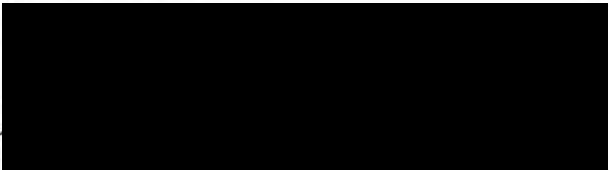
EPA Region 2 Director Gary Klawinski  
U.S. EPA - Region 2  
187 Wolf Road, Suite 303  
Albany, NY 12005

I'm a resident of North Carolina currently.  
I was born in New York. I would like to  
ask you to reconsider your conclusion of your  
second draft five-year review of the Hudson  
River Superfund project. I insist that your  
final report should clearly state that the  
clean up is not protective. Your final report  
should eliminate the unsubstantiated claim that  
the cleanup "will be protective". I believe a  
further study to determine if levels of ~~PCB'S~~ PCB'S  
are greater than previously determined, is required  
to understand the level of clean up needed. I  
hope the EPA remains to be a truly protective  
organization for the environment and not interests  
outside of this agreement. ~~OP~~ Thank you

Sincerely,

  
Adam Thompson

Jaden Thompson

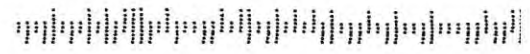


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EPA Region 2 Director Gary Klawinski  
U.S. EPA – Region 2  
187 Wolf Road, Suite 303  
Albany 12005

1220531138 0018



# More dredging is needed for the Hudson

John Thorpe [REDACTED]

Mon 8/21/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I grew up in the Albany area fishing in the polluted Hudson River as a young boy. The Hudson is on it's way back please don't stop the dredging now! This majestic river is the spawning estuary for most of the striper population on the Atlantic coast that moves to Cape Cod in the summer months. Please finish the job, you owe it to our grandchildren.

Sincerely,

Jack Thorpe

[REDACTED]  
[REDACTED]  
[REDACTED]

# FW: Hudson River

Klawinski, Gary J <Klawinski.Gary@epa.gov>

Tue 8/15/2017 2:52 PM

To: 'epahrfo@outlook.com' <epahrfo@outlook.com>;

Cc: Romanowski, Larisa <Romanowski.Larisa@epa.gov>;

From: judith mk e [REDACTED]  
Sent: Wednesday, July 26, 2017 8:38 PM  
To: Klawinski, Gary J <Klawinski.Gary@epa.gov>  
Cc: info@riverkeeper.org; Prui, Sc o <Pruir.Sc o@epa.gov>  
Subject: Hudson River

Dear Mr. Klawinski:

Thank you for keeping the Hudson clean. But we need to do more!

PCB concentrations (from Troy to Manhattan) haven't declined as expected due to dredging and so additional dredging up river is necessary.

Also, EPA MUST Require GE to further investigate the lower 150 miles of the Hudson River to ensure cleanup goals are met.

EPA must give more weight to studies by federal and state agencies that challenge EPA findings.

EPA cannot declare the cleanup complete until the PCB contamination in the entire Hudson River reaches a level that does not threaten human health and the environment.

Thank you for your time and keeping the Hudson clean!

RECEIVED  
JUL 27 2017



**COMMENT SHEET — 2017 Five Year Review Report**  
**Hudson River PCBs Superfund Site**

Name (Please Print): Sarah Todd

Agency/Organization: concerned citizen activist

Address: [REDACTED]

*Written comments must be postmarked by September 1, 2017*

COMMENTS:

As a resident of N.Y. state I have lived my entire  
58 yrs within easy reach of the Hudson River. For 45 yrs  
been working towards a clean / restored Hudson.

I am now a resident of Washington Co N.Y. This county  
has a very high rate of cancer (many rare forms), the high  
levels of PCB's in the soil and water are surely connected  
to in ordinate levels of cancer here! GE profited for  
decades while wantingly pumping PCB's into the glorious  
Hudson.

It is unacceptable that the EPA has determined  
no need for further clean-up at GE's expense. By EPA's acting  
MAYBE in 55 yrs "nature" will clean-up the residual PCB's.

Stop putting Corporate Profits over the welfare  
of the environment.

Please continue Active removal of PCB's  
We can not wait 2 more generations to see if the  
River Heals Itself.

*Written Comments can be sent by mail or email to:*

Gary Klawinski, Director  
EPA Region 2, Hudson River Office  
187 Wolf Road, Suite 303  
Albany, NY 12205

Do Your Job! Protect





Ms. Sarah D. Todd

ALBANY NY 120

29 JUL 2007 PM 3 L



Gary Klawinski Director  
EPA Region 2  
Hudson River Office  
187 Wolf Road  
suite 303  
Albany, N.Y.  
12205

12205-119879



Dear Director Klawinski,

I am a long-time resident of the West Side  
+ am so happy with the parks by the river.

I also am a long-time researcher of  
chemical spills in many waterways in the U.S.

PCBs will only disappear when the fish  
eat them + ~~stop~~ now there is a need to  
continue dredging. PLEASE! Your grandchildren  
deserve clean  
fish + water!

Sincerely,

Name:

Mary Tokuda

Address:

E-mail:

@



**SCENIC HUDSON**

scenichudson.org/pcbs



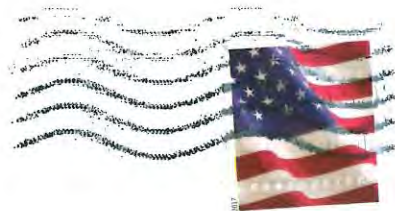
**RIVERKEEPER**

NY's clean water advocate

riverkeeper.org/pcbs

ALBANY NY 12205

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# #HealthyHudson

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SEP 06 2017

Gary Klawinski

Director, Hudson River Field Office

U.S. Environmental Protection Agency

187 Wolf Road, Suite 303

Albany, NY 12205



Dear Director Klawinski,

STOP Protecting the Big Corporation  
and give us little people a  
BREAK !!!

Sincerely,

Name: \_\_\_\_\_

Lito Trasmonte

Address: \_\_\_\_\_

E-mail: \_\_\_\_\_

@ \_\_\_\_\_



scenic Hudson.org/pcbs riverkeeper.org/pcbs



NEW YORK NY 100

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# #HealthyHudson

RECEIVED  
SEP 06 2017

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

2205-119878



# EPA Second Draft Year Review

Diane Trieste [REDACTED]

Wed 8/30/2017 2:19 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am a resident of Saratoga Springs and have enjoyed boating & fishing on the Hudson river. Which leads me to my concerns.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies. I would like to stress the following:

1. The report must state the remedy is not protective.
2. EPA must remove from the report the phrase "the remedy will be protective."
3. The report must call for additional dredging of PCBs in the upper Hudson.
4. The report must call for an investigation of contamination in the lower Hudson.

I appreciate your attention to this crisis.

Diane Trieste

Sincerely,

Diane Trieste  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Barbara Ungar [REDACTED]

Fri 8/25/2017 11:00 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

Please insist that GE clean up after itself! This is the most basic lesson we learn in kindergarten. The company is flush and should pay to clean up the mess it left behind, rather than forcing taxpayers to do so.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Dr. Barbara Ungar  
[REDACTED]  
[REDACTED]  
[REDACTED]

# Additional Dredging Required: EPA Second Draft Year Review

Michael Vagnetti [REDACTED]

Fri 8/25/2017 1:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am a proud New Yorker, and have spent many weekends along the Hudson River. Toxic PCBs there continue to threaten people and wildlife. This is our community, and we will only accept a solution that enacts additional dredging of PCBs in the upper Hudson.

The facts are telling us that more work is required. The EPA's own studies show PCB concentrations in fish haven't declined as expected as a result of the upriver dredging. The current levels of contamination in fish, sediment and water are much higher than expected. The only appropriate conclusion for these conditions is "not protective."

Every time we are near the river, we remember that something is wrong. The cleanup cannot be declared complete by the EPA until the PCB contamination in the entire Hudson River reaches a level that does not threaten human health and the environment.

Because of these facts, I would like to take a moment and discuss the language that the EPA will use in their report. First, the report must state the remedy is not protective. Second, the EPA must remove from the report the phrase "the remedy will be protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. The review makes clear that PCB levels in the fish and sediment of the Lower Hudson have not benefited at all from upriver dredging.

With more PCBs left in the river than anticipated, additional dredging of the upper 40 miles of the Hudson River is necessary.

The EPA must also give more weight to studies by federal and state agencies that challenge EPA's findings. It is very clear that more data is needed to determine if fish will recover in the reasonable time frame as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Remember, the river is where thousands of us live and take our recreation. The Hudson River is not the river we deserve, and we expect the EPA to take the above action. Nothing less is acceptable. Thank you for your consideration.

Sincerely,

Michael Vagnetti  
[REDACTED]  
[REDACTED]  
[REDACTED]



# EPA Second Draft Year Review

Peter Van Aken [REDACTED]

Mon 8/21/2017 3:30 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am a current 19 year resident of the City of Poughkeepsie, New York, and I grew up in Hyde Park, New York. Both communities border the Hudson River.

The drinking water from both communities comes directly from the Hudson River- so having a clean and contamination-free source of drinking water is extremely important to me.

In 2014 I helped organize and bring to the Hudson River in Poughkeepsie a recreational water sport activity called "Dragon Boat Racing". This event, held annually since 2014 on the Hudson River in Poughkeepsie, brings thousands of local residents, regional participants, and spectators and tourists to the shores of the river, to enjoy and appreciate the benefits of a clean Hudson River. ([www.dutchessDragonBoat.org](http://www.dutchessDragonBoat.org)).

I urge the EPA to state in its report that the remedy is NOT protective. I urge the EPA to remove from its report the phrase "the remedy will be protective"

I urge the EPA to call for additional dredging of PCBs in the upper Hudson River.

I urge the EPA to call for an investigation of contamination in the lower Hudson River.

Other concerned knowledgeable individuals have compiled a series of facts, which I urge the EPA to be aware of, and to consider in making a recommendation:

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective".

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties-especially those who subsist on the river's fish-face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

In conclusion, I again urge the EPA to state that the remedy is NOT protective.

Sincerely,

Peter Van Aken  
[REDACTED]  
[REDACTED]  
[REDACTED]

# Hudson River Superfund Site Five Year Review

Mark Varian [REDACTED]

Tue 8/29/2017 5:58 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Gary Klawinski, Director  
EPA Region 2, Hudson River Office  
187 Wolf Road, Suite 303  
Albany, NY 12205

Dear Sir,

I attended the public information meeting in Poughkeepsie on June 28th and have read through portions of the FYR. Thank you for your informative presentation and your apparent concern for the condition of the Hudson River. After so much hard work and expense I find it very disappointing that today the "EPA recognizes that the remedy at Operating Unit 2 to be not yet protective of human health and the environment." I understand that the expectations of the Record of Decision have so far been met. And for that I am grateful for the efforts of the EPA. Yet it will be decades before the Hudson River is "protective of human health and the environment."

The five year review states that the EPA and other agencies will continue to monitor the effects of the clean-up and to implement whatever actions are necessary until the "natural attenuation component is complete." How can we be guaranteed that this superfund program will not be subject to the massive cuts projected for the EPA by the current administration? We were told at the public information meeting that GE continues to be liable to fulfill its responsibilities under the ROD. In this atmosphere of deregulation how can we be sure that the current administration will continue to require GE to comply with EPA demands?

EPA should be out front with the details of this five year review. The agency must state that the clean-up of the Hudson River is far from over. The current administration must also state that this program will continue and that GE will be responsible until the work is complete. The EPA should also undertake any studies and consider any technology that may be used to shorten the timeline for satisfactory completion of this very important project.

Sincerely,

Mark Varian  
[REDACTED]

# EPA Second Draft Year Review

Jessica Vaughan [REDACTED]

Tue 8/22/2017 9:50 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

My family and I have lived, worked and raised our families in the beautiful Rivertowns of Stony Point and Haverstraw for generations. We have watched the pollution and destruction of our majestic Hudson River and been devastated by it's effect. From actually having usable beaches and edible fish to places that were nothing more than toxic waste sites. A few decades ago when stories of my parents and grandparents bucolic life on the shorelines of the Hudson were just memories, residents called upon government officials to clean up our river. I was skeptical that it would ever be possible and that I would never see the river returned back to it's former glory. There is still much work to be done and the river is still not what it needs to be, yet I still walk the parks along the river regularly and dream of the possibilities and the hope that the river of past generations can be returned to us. The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

The report must state that the remedy is NOT PROTECTIVE and the EPA must remove the phrase "the remedy will be protective". Also the report must cal for additional dredgingof PCB's in the upper Hudsonand call for an investigation of contamination in my beloved lower Hudson!

Sincerely,

Jessica Vaughan  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Jason Velez [REDACTED]

Tue 8/22/2017 11:30 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am Jason Velez. I currently reside in Irvington, NY. I previously lived in Cornwall on Hudson, NY. I've spent my entire life living on the Hudson River. I do appreciate the efforts made, but more should be done to complete the cleanup.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Thank You very much for your time and consideration,  
Jason Velez

Sincerely,

Jason Velez  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Harry Vincent [REDACTED]

Fri 8/25/2017 11:00 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski, My name is Harry Vincent . I was born and raised in Catskill NY and presently still live in Catskill. When I was a young child I remember raw sewage would go into the Hudson River. The garbage was picked up each week and was dropped off in a spot next to the Hudson River. They would burn the garbage and with what was left they would push it in The Hudson River. They finally realized that it was polluting the river. Certain fish and other aquatic creatures were dying off. They stop the pollution and the Hudson River became clean and safe again. The Hudson is polluted again and unsafe for swimming, and other recreation along the Hudson Valley . PCB's need to be COMPLETELY REMOVED from the river The report should call for additional dredging of PCB's in the upper Hudson . The report must call for an investigation of contamination in the lower Hudson. The report must state the remedy is not protective. EPA must remove from the report the phrase "the remedy will be protective

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Harry Vincent  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

You need to clean our river.

Your remedy is not working.

You say its protected but protective off what.

The report must state 'the remedy is not protective and EPA must remove from the report the phrase 'the remedy will be

Sincerely,

Name:

Connie Viron

Address:

E-mail:

protected  
1 11 412



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scenichudson.org/pcbs riverkeeper.org/pcbs



**RIVERKEEPER**  
NY's clean water advocate

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# #HealthyHudson

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SEP 01 2017



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# More dredging is needed for the Hudson

Tico Vogtt [REDACTED]

Mon 8/21/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

"The report must state the remedy is not protective. And EPA must remove from the report the phrase the remedy will be protective." ample message, you should customize this.

Sincerely,

Tico Vogtt

[REDACTED]  
[REDACTED]  
[REDACTED]



# Protect our river

Leslie Von Pless [REDACTED]

Wed 8/23/2017 8:29 AM

To: Gary Klawinski, Project Director, EPA <epahrfo@outlook.com>;

Aug 23, 2017

Mr. Gary Klawinski, Project Director, EPA  
US EPA Hudson River Field Office, Region 2, 187 Wolf Road, Suite 303  
Albany, NY 12205

Dear Mr. Klawinski, Project Director, EPA,

The Hudson River PCB cleanup is clearly not finished. PCBs remain in the river and the levels continue to threaten people and wildlife. It is not yet safe to consume fish from the river, nor swim or enjoy the river to its full recreational potential. The cleanup cannot yet be declared complete. I am writing to urge continued work on the river until it is safe and healthy.

I'm a resident of Ossining, NY. My partner and I moved here about a year ago from Brooklyn, looking to move out of the city and settle in the beautiful Hudson Valley. We are a young couple and want to build a family and a life here. We want our river to be safe and healthy not just for our future family, but for generations to come.

Sincerely,

Ms. Leslie Von Pless

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

# We need you to fulfill your agreement

Dorothy Wadsworth [REDACTED]

Mon 8/21/2017 11:30 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Please continue dredging the Hudson River.. we need these cancer causing agents out of the river..please do not let it stay a toxic dump...we live on this river, some drink water from this river, birds and fish swim in it and it is an important source of tourist interest and revenue for our areas.

Sincerely,

mwadsworth

[REDACTED]  
[REDACTED]  
[REDACTED]

# Tired of GE corporate welfare

Jennifer Walford [REDACTED]

Fri 8/25/2017 6:34 PM

To: Gary Klawinski, Project Director, EPA <epahrfo@outlook.com>;

Aug 25, 2017

Mr. Gary Klawinski, Project Director, EPA  
US EPA Hudson River Field Office, Region 2, 187 Wolf Road, Suite 303  
Albany, NY 12205

Dear Mr. Klawinski, Project Director, EPA,

Tired of y'all using my money to protect corporations. GE made the mess, it's time it cleans it up. I already have stopped buying anything related to GE and have encouraged everyone I know to do the same. I've also made sure everyone I know makes sure they DIVES from GE because of this event.

These games need to stop.

Sincerely,

Ms. Jennifer Walford  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

WESTCHESTER NY 105

Alison Walker



Protect our Hudson River  
and support the  
PCB clean-up.

We only have  
one chance at  
one earth!

Thank you!!

Gary Klawinski  
EPA Regional, Hudson River  
187 Wolf Road #303  
Albany, NY  
12205

#POSTCARDSFORAMERICA

Support PCB

Emily Walker



clean up in our beautiful Hudson River. Pollution has no business in our waters!!

Thank you!

Keep NY

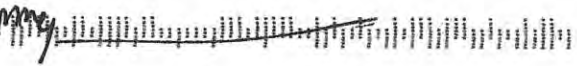
State great

Gary Klawnski  
EPA Region 2, Hudson River Office  
187 Wolf Rd # 303  
Albany NY

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JUL 27 2017

12205

#postcardsfromMummy



# EPA Second Draft Year Review

Bella Wang [REDACTED]

Mon 8/28/2017 4:34 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

As a Manhattan resident, I am concerned about the levels of PCB contamination in fish, sediment and water observed in the Hudson River. The EPA must specifically state in its recommendations that, as the New York State Department of Environmental Conservation found, "The Remedy is not protective of human health and the environment based on uncontrolled risks."

Given that the EPA discovered that there was three to five times more contamination in the Upper Hudson than previously estimated, the EPA needs to expand the cleanup process in the upper Hudson. There are people who live and play in this water; even in Manhattan which is far downriver, there are people who kayak in potentially polluted water. The EPA undertake a study of downriver contamination and plan for appropriate remedial action.

I urge the EPA to follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies. We have scientific evidence of contamination, and must act to clean it up.

Sincerely,

Bella Wang  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

I am in support of continued  
dredging along the Hudson River in  
New York state.

Sincerely,

Name:

Kathleen Wasser

Address:

[Redacted address]

E-mail:

[Redacted email]



**SCENIC  
HUDSON**

[scenichudson.org/pcbs](http://scenichudson.org/pcbs) [riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)



**RIVERKEEPER**  
NY's clean water advocate

ALBANY NY 122

26 AUG 2017 PM 1 1



**#HealthyHudson**

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

**RECEIVED**  
AUG 29 2017





# EPA Second Draft Year Review

Laura Ward [REDACTED]

Tue 8/22/2017 11:00 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

Our water is so important and the wildlife that lives on and in the Hudson needs our help. Humans owe a debt to the Earth. We live off of her bounty, we need to keep her clean!

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,


Laura V Ward  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

You have an obligation to protect us from pollution and the harmful impact it has on our health and the health of our community. It is your responsibility. The profits of GE should not matter more than the health of people and our environment. Do your job. Hold GE

Sincerely,

Name: Robyn Waters

Address: 

E-mail: 

accountable.



scenichudson.org/pcbs riverkeeper.org/pcbs



# #HealthyHudson

RECEIVED  
SEP 01 2017



Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



July 25, 2017

RECEIVED  
JUL 28 2017

EPA Region 2 Director Gary Klawinski  
U.S. EPA - Region 2  
187 Wolf Road, Suite 303  
Albany, NY 12005

I am a resident of Long Island, New York. I have spent the summer along the Hudson River and I've also enjoyed a great deal of time on the River in the 5 borough area. EPA, you must reconsider the conclusion of your Second Draft Five-Year Review of the Hudson River Superfund project. The fact that you allow your morals and duty to protect the environment to be so easily swayed for corporate interest is deplorable. The "cleanup job" you assigned GE was a poor attempt at making the public satisfied; the contamination levels you deem "acceptable" is a disgrace. Acceptable pollution is a big step in a dangerous direction that leads to human and environmental life being completely disregarded. Please reconsider your decision to ignore your duties. Do your job!

Sincerely,



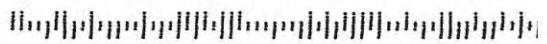
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EPA Region 2 Director Gary Klawinski  
U.S. EPA – Region 2  
187 Wolf Road, Suite 303  
Albany 12005

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RECEIVED  
JUL 28 2017

July 25, 2017

Gary Klawinski, Project Director  
EPA Region 1 Hudson River Office  
187 Wolf Road, Suite 302  
Albany, New York, 12205

Dear Mr. Klawinski

I retired from the NYSDEC in 1995. I had almost 30 years experience as a licensed engineer in the flood protection unit and was involved in dredging millions of cubic yards of sand for shore protection projects off Long Island. Over the years I developed an understanding in how streams and rivers move sediment and repair habitat damage from construction activities. I served on the committee reviewing proposals to address the PCB discharge from Hudson Falls and Fort Edward plants in the early 1990's.

This review of proposals followed several significant and major flooding events. I came to a personal conclusion that too much time passed to efficiently remove the PCB contamination from the river. The various flooding events, spread the PCBs far down the river system reducing the effectiveness of a dredging project. I wrote to the Schenectady Gazette expressing this opinion. Nevertheless EPA made the decision and ordered GE to "clean up" the river in February of 2002.

The original cost estimate was \$500 million. GE did what was ordered to do at a cost of \$1.7 billion and removed an estimated 2,750,000 cubic yards of sediment containing an estimated 65% of the PCBs. Political decisions forced GE to transport the PCB sediments out of state. I was surprised to discover that the sediment was transported to Ohio, Michigan, Oklahoma and as far west as West Texas for disposal. As an energy environmentalist, I was curious as to the cost to transport 2.75 million cubic yards of sediment out of state. Neither the EPA nor GE could provide an answer. The cost in energy consumption to do so was significant.

Due to the many flooding events, PCB's have moved down the river system to the ocean 200 miles south. I find it remarkable that 65% of the PCB discharge was captured in the dredging project. The cry by many to "do more" should be denied as further dredging activity will be ineffective. The river is recovering (even before initiation of the dredging project) and will continue to do so.

The estimate of 50 years for the PCB contamination level in fish decline to acceptable levels seems overly pessimistic. That time period represents several generations of fish life. I believe the time period

to reach the goal will be much less. Additional dredging will likely not accelerate improving the health in the fish population.

One final comment: The DEC, strongly urging additional dredging, is NOT without guilt concerning this project. The DEC issued a permit in 1973 to remove a derelict dam located a few miles downstream from the GE plants at Hudson Falls and Fort Edward. That derelict dam collected debris for a hundred years. Probably, essentially all the PCB discharge had collected behind that dam. Upon its removal, under the DEC permit, the contaminated sediment rapidly moved down the river system from the Spring floods. If the sediment build up behind the dam was recognized, the sediment and a very high percentage of the PCBs could have been removed for a few million dollars. I doubt no one in the current DEC management is aware of this fact.

Sincerely,

A handwritten signature in cursive script that reads "Russ Wege". The signature is written in black ink and is positioned above the printed name.

Russell Wege

Retired Engineer

Russell Wege



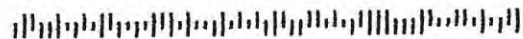
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Gary Klawinski, Project Director  
EPA Region 1 Hudson River Office  
187 Wolf Road, Suite 302  
Albany, New York, 12205

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July 25, 2017

RECEIVED  
JUL 28 2017

EPA Region 2 Director Gary Klawinski  
U.S. EPA - Region 2  
187 Wolf Road, Suite 303  
Albany, NY 12005

Dear Mr. Klawinski,

I am a resident of High Falls, NY and care deeply about the Hudson River and having access to it.

Please reconsider your conclusion of the 2nd Draft 5 year Review of the Hudson River Superfund project. I ~~strongly~~ <sup>strongly</sup> urge that ~~your~~ your final report ~~must~~ <sup>must</sup> plainly state that the cleanup is not protective. Your final report <sup>should</sup> eliminate the unsubstantiated claim that the clean up will be protective.

It is not okay that the current levels of contamination in fish, sediment and water are so much higher than expected - please finish the job!

Sincerely,

Laura Weiland

Laura Neiland

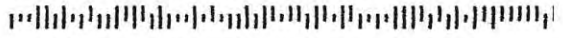


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EPA Region 2 Director Gary Klawinski  
U.S. EPA – Region 2  
187 Wolf Road, Suite 303  
Albany 12005

12205-110070



# EPA Second Draft Year Review

Gerald Wein [REDACTED]

Fri 9/1/2017 2:30 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am a resident of the Hudson Valley and have a deep appreciation for the river and what it means for our communities in terms of beauty, commerce, and sustenance.

I am aware that the EPA had drafted a report, based on GE's clean-up efforts to date, that acknowledges results that are far below expectations set at the beginning of the project but nonetheless speculates that the "remedy" will be protective.

I am asking that you please amend the report to clearly state the fact that the remedy is not protective and further that you demand additional action on the part of the acknowledged polluter to bring result within a reasonable variance from plan and expectation.

We need your help to restore and protect this wonderful natural resource.

Thank You.

Sincerely,

Gerald Wein  
[REDACTED]  
[REDACTED]  
[REDACTED]

# More dredging is needed for the Hudson

Mark Weinstein [REDACTED]

Mon 8/21/2017 2:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

The thought of ending the cleanup of the Hudson River, while so many toxins remain, and so much more in the way of protecting the many residents and visitors to the area, by way of continued dredging and cleanup of the River is depressing. My wife and I, our children and grandchildren find exercise, relaxation, entertainment and culinary experiences in, over and nearby the beautiful Hudson River. The River and her residents must be protected by continuing the clean-up

Sincerely,

Mark J. Weinstein

[REDACTED]  
[REDACTED]  
[REDACTED]

# PCB clean up /Hudson River

Harvey Weiss [REDACTED]

Fri 9/1/2017 3:58 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

To Members of the EPA-

As a tax paying property owning citizen and resident living adjacent to the Hudson River I ask that the EPA live up the "Protection" part of it's name and follow thru with insisting that the still unfinished clean up of PCBs poisoning our river be implemented without further delay. To do otherwise would break your pledged mission to protect our environment and the safety of our citizens. Besides being an ecological poisoning, the PCB' dumped in our river by General Electric represents an affront to the region's historically symbolic place as a cradle of American culture. Being the birthplace of numerous revolutionary cultural, technological, social, and political ideas has had an essential impact in forming our country.

The Hudson River is America's Nile and should be treated with the reverence it deserves.

Sincerely,

Harvey Weiss  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Tierney Weymueller [REDACTED]

Mon 8/21/2017 3:32 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am a resident of the Hudson Valley and a student at Bard College in Annadale-on-Hudson. I have had the good luck to fall in to studying Environmental science, and looking specifically at water. I have been even luckier to work on board the sloop Clearwater, as well as a watershed community group. What has struck me so much in my time here, is how important the Hudson River is to the communities it travels through. The Hudson River, and its tributaries, is an extremely important resource to people here, and deserves to be protected. This is why I am writing a letter because this is not good enough, the report must state the remedy is not protective.

The EPA must remove from the report the phrase "the remedy will be protective." The report must call for additional dredging of PCBs in the upper Hudson. And the report must call for an investigation of contamination in the lower Hudson. These are my demands as a resident of the Hudson Valley.

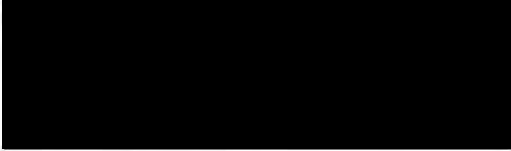
Thank you so much for your time and your attention.

Sincerely,

Best, Tierney Weymueller

[REDACTED]  
[REDACTED]  
[REDACTED]

Cindy Wian



RECEIVED  
SEP 01 2017

August 28, 2017

Gary Klawinski  
Hudson River Field Office  
187 Wolf Road, Suite 303  
Albany, NY 12205

Dear Gary;

Imagine if the engineers who designed the space shuttle learned that the exposure to certain temperatures on the launch pad was far more dangerous to those on board than their original designs had accounted for.

Imagine if pregnant mothers learned that exposing unborn children to alcohol posed far greater risks to fetal development than previously assumed.

Imagine if doctors were presented with a new set of data that reflected a devastating connection between the smoke of a cigarette and death rates from cancer.

*Of course we can agree that in all of these situations, drawn from our own history, scientists used data to highlight and rethink assumptions about what poses risks to human health, and consequently identified what subsequent actions needed to be taken.*

I am a resident of the Town of Victory, and my family and I spend time on the Hudson River and Champlain Canal for recreation year-round. In addition, I am the director of Hudson Crossing Park, and as such I devote much of my professional time advocating for the importance of outdoor recreation and public access to lands and water for a healthy community. I have supported and, at times, even facilitated the investment of literally millions of local, state, and federal funds to create a destination in Schuylerville that promotes economic revitalization along with human and environmental health.

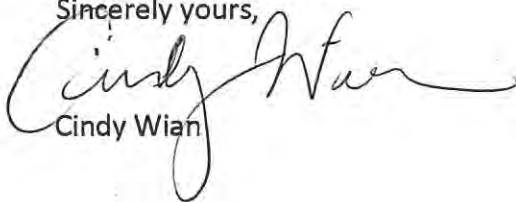
From what I have learned in the recent public hearings and through the public reports, I am deeply troubled that the EPA has agreed that assumptions were made, and that those assumptions have now been exposed as dangerously flawed. It appears that the efforts of the dredging process were woefully insufficient, presenting an alarming and ongoing threat to the health of the waterways and the people who rely on them for work and play as well as the flora and fauna living in and near them.

In response to the Five-Year Review Questions:

1. Is the remedy functioning as intended by the decision documents? NO
  - a. It is clear from the initial information on habitat and fish samples that it is taking longer for recovery than anticipated. PCB's were far deeper and more dispersed than the ROD anticipated.
  - b. Habitat reconstruction has not resulted in repopulation of species within the parameters that the ROD anticipated.
  - c. Resuspension and down river redistribution of sediments into the flood plains has not been addressed.
  
2. Are the exposure assumptions, toxicity, data, cleanup levels, and remedial actions objections used at the time of the remedy selection still valid? NO
  - a. The variability of testing methods has tainted the results to date.
  - b. The ROD left behind significant deposits throughout the upper Hudson that are not part of the cleanup. Those deposits are in excess of standards used in other PCB cleanup projects and leave our river subject to additional cleanup costs every time we attempt a project – whether residential or public.
  
3. Has any other information come to light that could call into question the protectiveness of the remedy? MOST DEFINITELY YES
  - a. The original Champlain Canal was not included in the remedy and it is hydrologically part of the Hudson River. Significant PCB concentrations were found and partially removed from the canal north of Lock 5, yet the original canal was ignored. The original canal is now so silted in with blocked culverts and dead fall that it is often stagnant and overflows the banks during heavy storms.
  - b. The ROD ignored the industrial and recreational use of the river when it required dredging only to the depth of the contamination – ignoring the fact that New York State has been unable to dredge to required depths for decades. Additionally, the EPA (with the ROD as an excuse) refilled areas that had silted in over the decades – impeding industrial and recreational use.
  - c. The ROD focused on river sections closer to Fort Edward, ignoring contamination of the same toxicity in river sections below Lock 5. Those areas will continue to redeposit PCB's in the upper river, the flood plains and the lower river.

For these reasons – I urge the EPA to recognize that the remedy as designed is not protective. Additional dredging is required if those of us in the upper Hudson are to have a clean river. We cannot undertake projects and use of our river with the knowledge that the legacy of PCB's is still lurking in the sediments and floodplains.

Sincerely yours,



Cindy Wian



# Dredge Hudson more

Jared Widjeskog [REDACTED]

Mon 8/21/2017 12:01 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I'm Jared Widjeskog from Stuyvesant, NY in Columbia County, right on the river. The river is our home, and we can't and should not live in a sickened, toxic environment. Nature is crucial to our lives and well-being, and we should not be avoiding it due to toxins.

Additional dredging is a must! The cleanup is not complete -- The EPA must declare the cleanup "not protective" of human health and the environment.

The report must state "the remedy is not protective"; the EPA must remove from the report the phrase "the remedy will be protective."

Consider the National Oceanic and Atmospheric Administration's conclusion that "Recovery of the Upper and Lower Hudson will not be reached due to elevated PCBs remaining in surface sediment equivalent to a series of Superfund Sites being left behind."

The EPA must also follow its own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

We are not done. This is our heritage! Complete what was started -- The EPA must declare the cleanup "not protective" of human health and the environment.

Thank you,  
Jared Widjeskog

[REDACTED]

Sincerely,

Jared Widjeskog

[REDACTED]

[REDACTED]

[REDACTED]

# Save the Hudson River

Trisha Wild [REDACTED]

Wed 8/23/2017 10:30 PM

To: Gary Klawinski, Project Director, EPA <epahrfo@outlook.com>;

Aug 23, 2017

Mr. Gary Klawinski, Project Director, EPA  
US EPA Hudson River Field Office, Region 2, 187 Wolf Road, Suite 303  
Albany, NY 12205

Dear Mr. Klawinski, Project Director, EPA,

The health, safety, and quality of life for people and wildlife is far more important than anything else.

Sincerely,

Trisha Wild

Sincerely,

Ms. Trisha Wild  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

# Hudson River PCB cleanup

Courtney M. Williams [REDACTED]

Fri 8/25/2017 1:39 PM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

Cc: info@riverkeeper.org <info@riverkeeper.org>; pruit.scott@epa.gov <pruit.scott@epa.gov>; Congresswoman Nita Lowey <nl@mail.house.gov>; Congresswoman Nita Lowey <rep.nitalowey@mail.house.gov>;

I am writing to urge the EPA to demand a thorough cleanup of GEs PCB contamination of the Hudson River.

I live along the river in Peekskill, NY. I have grown up in the Hudson Valley. Now, I am raising my own children here and I want a river that they can fish and swim in without fear.

I am a cancer researcher. I am well aware of the health risks of PCB contamination. This dangers are well-documented in the scientific literature. PCBs pose a significant risk to public health.

Below the Troy Dam, all the way to Manhattan, the EPA's own studies show PCB concentrations in fish haven't declined as expected as a result of the upriver dredging. In my city there are many people who fish and eat from the river- ignorant of, or in spite of, the posted signs warning about consuming fish, crabs, shellfish from the river.

This is a man-made, GE-made, natural disaster, and GE must be held accountable for the damage they have done. While it is unlikely that individual PCB-related cancer deaths caused can be conclusively attributed to GE contamination, the science is clear that there have been such deaths.

The EPA has an opportunity to right this wrong and protect the health of future generations in the Hudson Valley. If the EPA does not act and force GE to clean up the river, future PCB-related deaths will be as much the fault of the EPA as GE.

Your inaction will make you and your agency complicit in this ongoing crisis.

The EPA's mission is to to protect human health and the environment. You will be in gross violation of that mission if you do not follow-through on the promises made to the people of New York, and ensure the river is restored.

As a New Yorker and as a cancer researcher, I demand:

- With more PCBs left in the river than anticipated, additional dredging of the upper 40 miles of the Hudson River is necessary.
- GE should be required to further investigate the lower 150 miles of the Hudson River to ensure cleanup goals are met.
- EPA must give more weight to studies by federal and state agencies that challenge EPA's findings.
- The cleanup cannot be declared complete by the EPA until the PCB contamination in the entire Hudson River reaches a level that does not threaten human health and the

environment.

Do the right thing, for the public health and the environment, and make GE clean up its pollution and restore the Hudson River.

Courtney M. Williams, PhD  
Vice President, Safe Energy Rights Group  
Peekskill Resident

# More dredging is needed for the Hudson

Jason Williams [REDACTED]

Mon 8/21/2017 11:49 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am a resident of Ulster county. For long as I can remember the Hudson River has been a huge part of my life. Whether fishing, hunting or recreational swimming I spend just as much time or more on the river as I do away from it. My love for the Hudson has always been tainted by the pollution lying within its waters and beneath. Without accountability for wrongful activity we will continue to see more and more sewage spills and careless pollution in the years to come. Those who have carelessly contributed to the corruption of this beautiful body of water need to remain accountable for their consciously carried out actions.

Sincerely,

Jason Williams

[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Autumn Williams-Wussow [REDACTED]

Mon 8/21/2017 4:50 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

I am a resident is Beacon, NY. My children play in the Hudson River and connecting creeks. GE must be required to clean up its mess in the river. Please make the report do the following:

- state that the remedy is not effective
- remove the phrase "the remedy will be protective."
- call for additional dredging of pcbs in the Hudson
- call for an investigation of contamination in the lower Hudson

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Autumn Williams-Wussow  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Geniene Wilson, MD [REDACTED]

Mon 8/21/2017 4:00 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

I am a Family Medicine doctor and a resident of Athens, NY - a small village right on the Hudson River. The contamination of the river directly impacts me, my family and my patients.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Geniene Wilson, MD  
[REDACTED]  
[REDACTED]  
[REDACTED]

*Saratoga Public Meeting*

**COMMENT SHEET — 2017 Five Year Review Report**  
**Hudson River PCBs Superfund Site**

Name (Please Print): SALLY WILSON

Agency/Organization: \_\_\_\_\_

Address: \_\_\_\_\_

**Written comments must be postmarked by September 1, 2017**

COMMENTS:

*The present 'admin.' in DC does not care. GE has to care  
I hope the guy in DC gets impeached.  
NYS has to lead the way & set an example  
The EPA is going to do what's right for  
the people & wildlife that depend on the  
Hudson. Finish the job damn it.*

**Written Comments can be sent by mail or email to:**

Gary Klawinski, Director  
EPA Region 2, Hudson River Office  
187 Wolf Road, Suite 303  
Albany, NY 12205  
email: epahrfo@outlook.com



# Comments on EPA's 5 year review of the Hudson River dredging project

Sarah [REDACTED]

Thu 7/20/2017 7:09 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

EPA's mandatory five-year review of the dredging project is intended to assure that human health and the environment are being protected by the cleanup—in this case, to confirm that enough PCBs have been removed to protect people and facilitate the healing of a severely damaged Hudson River ecosystem.

Despite the presence of far more PCBs than assumed when the cleanup was designed, EPA has determined that the cleanup “will be protective” of human health and the environment in the Upper Hudson (north of the Troy Dam). For the Hudson River south of Troy, EPA admits that the Lower River is not seeing any benefits from the dredging project.

EPA has ignored expert science by the National Oceanic and Atmospheric Administration, the New York State Department of Environmental Conservation and the Hudson River Foundation that concludes the River will not recover for many decades beyond the cleanup goals set forth by EPA. This means those

who live, work and/or recreate along the Hudson River will continue to be exposed to high levels of PCBs through air, water, sediment and fish for at least another century. Advisories against eating fish will remain in place for the foreseeable future, with women of childbearing age and children continuing to be advised to eat no fish at all. Local governments can't look for a return of the river's full economic potential anytime soon.

GE's toxic PCBs continue to threaten people and wildlife. EPA and GE must do more

--

Sarah Wilson

# EPA Second Draft Year Review

Tania WOLF [REDACTED]

Wed 8/30/2017 2:30 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

Scenic Hudson preserves land and farms and creates parks that connect people with the inspirational power of the Hudson River, while fighting threats to the river and natural resources that are the foundation of the valley's prosperity.

The Hudson River is one of New York State's greatest natural resources. And if we don't speak up now, a healthy and clean Hudson may fall out of reach. The Hudson River Superfund cleanup has not done the job it was meant to do—secure the health of the river, its wildlife and the people living along it. Yet the EPA is hell-bent on letting GE off the hook for the accelerated clean-up that is needed and is declaring victory as our river remains unhealthy and dangerous.

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered—after the remedy was determined—that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,


Tania Wolf  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Director Klawinski,

Step up. Protect the Hudson.  
Make GE clean-up. We  
are counting on you!

Sincerely,

Name: Bill Wolford

Address: 

E-mail: 



**SCENIC  
HUDSON**

[scenichudson.org/pcbs](http://scenichudson.org/pcbs) [riverkeeper.org/pcbs](http://riverkeeper.org/pcbs)



**RIVERKEEPER**  
NY's clean water advocate

NEW YORK NY 102

28 AUG 2017 PM 6 L



# #HealthyHudson

Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205

RECEIVED  
AUG 31 2017



Dear Director Klawinski,

I am a resident of Kingston, NY,  
but more importantly a concerned citizen  
regarding the beautiful Hudson River.

I am adamant that the EPA's final  
5 year review should state that despite  
attempts at cleanup, The Remedy Is Not  
Protective.

Sincerely,

Name: \_\_\_\_\_

DOUG WYGAL

Address: \_\_\_\_\_

E-mail: \_\_\_\_\_

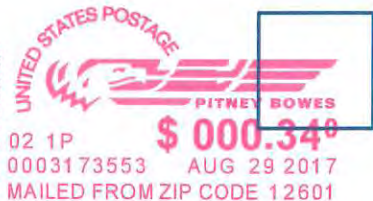


scenichudson.org/pcbs riverkeeper.org/pcbs



# #HealthyHudson

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Gary Klawinski  
Director, Hudson River Field Office  
U.S. Environmental Protection Agency  
187 Wolf Road, Suite 303  
Albany, NY 12205



# FW: Second Five Year Review of the Hudson River Superfund Site

Romanowski, Larisa <Romanowski.Larisa@epa.gov>

Tue 6/13/2017 7:27 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

From: Elizabeth Yalkut [REDACTED]

Sent: Monday, June 12, 2017 8:55 PM

To: Klawinski, Gary J <Klawinski.Gary@epa.gov>; Romanowski, Larisa <Romanowski.Larisa@epa.gov>

Subject: [WARNING: SPF validation failed] Second Five Year Review of the Hudson River Superfund Site

I am writing to respond to the ongoing Second Five Year Review of the Hudson River Superfund Site; I am deeply concerned that the review fully acknowledge the data collected and shared with EPA Region 2 indicating the PCB contamination throughout the river continues at unacceptably high levels, dangerous to both human health and the environment. The EPA must not claim the existing remedy suffices to meet the commitments the agency made to the landscape and the people of New York.

I have traveled throughout the United States and have always been grateful for the opportunity to experience the extraordinary landscape of this country; the landscape, and the history embedded within it, each place unique and irreplaceable. I have always come home to New York and the wide mahogany Hudson River, and been grateful for the view out the Amtrak train as I went north from New York City, watching the Catskills and Adirondacks unfurl.

I remember the condition the Hudson was in when I was a child; I remember the condescending, cowardly ads that General Electric put out, claiming the river was "cleaning itself." I have been thrilled as the EPA has committed itself to repairing the devastating, criminal, chemical insult we dealt the beautiful Hudson River Valley.

We live already in a world where it is far too uncertain whether our grandchildren will be able to enjoy the land and the seas as we knew them. Do not accelerate this process of devastation when you have the power to arrest it. The clean-up effort, including dredging, has already done so much, and we have a rare opportunity to make right the damage we have inflicted on this earth, as we must do unless we wish the greatness of America to become no more than empty rhetoric, stripped of value and meaning like the earth of its strange and wild and beautiful places.

Thank you for your time, attention, and dedication --

Elizabeth Yalkut  
[REDACTED]

FW: Hudson River Site (DBON-AQJFGZ, OPM No. 17-93, RPL No. 171569)

Romanowski, Larisa <Romanowski.Larisa@epa.gov>

Thu 8/24/2017 10:58 AM

To: epahrfo@outlook.com <epahrfo@outlook.com>;

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From: Zachos, George  
Sent: Thursday, August 24, 2017 10:57 AM  
To: [REDACTED]  
Subject: Hudson River Site (DBON-AQJFGZ, OPM No. 17-93, RPL No. 171569)

Good Morning Ms. Yarrobino,

Thank you for your correspondence!

Your e-mail below sent late yesterday (August 23) was immediately forwarded to this Office for response.

After dumping millions of pounds of PCBs into the Hudson River over three decades, it's unconscionable that General Electric would plan to leave a 200-mile long stretch of the river contaminated.

Under the current cleanup plan, 35 percent of the PCBs that GE pumped into the Hudson would remain there, continuing to contaminate fish and other wildlife, and put the health of people who live near the river in danger. A 65 percent clean up isn't good enough.

The river belongs to all of us and GE's actions have made it inaccessible to commercial fishing and recreation for over thirty years. The toxic legacy of PCBs in the Hudson is General Electric's responsibility. The cleanup can't stop until all of the PCB contamination is remediated.

erin yarrobino

[REDACTED]

EPA's proposed Five Year Review report for the Hudson River PCBs Superfund site was released on June 1 for a 30-day public comment period and was extended to a new deadline of September 1, 2017. Your comments will be considered along with others we receive during this time.

For your convenience, the second the five-year review report is available at [www.epa.gov/udson](http://www.epa.gov/udson).

Thank you!

Have a nice day,

George



George H. Zachos  
Office of the Director  
Accelerated Cleanup Manager and Regional Public Liaison (formerly Superfund Ombudsman)  
[732-321-6621; toll-free, 1-888-BUDSMAN (283-7626)]

# More dredging is needed for the Hudson

Kathleen Young [REDACTED]

Mon 8/21/2017 12:04 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

My family and I love boating, fishing and swimming on the Hudson River. It is part of your job to ensure that our river is a safe from toxins left by industry's misuse. Please do not let this cleanup end with it being halfway done. The cleanup is not finished and the EPA report must include wording such as "the remedy is not protective", because, the current cleanup is not complete and at this stage it is not protective.

Thankyou

Kathleen Young

Sincerely,

Kathleen Young

[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

Brook Zelcer [REDACTED]

Wed 8/30/2017 2:20 PM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

As a birdwatcher from Northern New Jersey I often spend time along the Hudson searching for waterfowl. Those waterfowl can only visit the Hudson if it is healthy. Please ensure that GE finish what it started so that the health of this eco-system can be restored (as much as possible) before the contamination for which they are responsible.

Current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

Brook Zelcer  
[REDACTED]  
[REDACTED]  
[REDACTED]

# FW: Comments on Hudson River Project Review

Klawinski, Gary J <Klawinski.Gary@epa.gov>

Tue 8/15/2017 2:55 PM

To: 'epahrfo@outlook.com' <epahrfo@outlook.com>;

Cc: Romanowski, Larisa <Romanowski.Larisa@epa.gov>;

From: [REDACTED]  
Sent: Thursday, July 20, 2017 11:34 AM  
To: Klawinski, Gary J <Klawinski.Gary@epa.gov>  
Cc: info@riverkeeper.org; Prui, Sc o <Prui.Sc o@epa.gov>; stefanik@house.gov; atlanc.chapter@sierraclub.org  
Subject: Comments on Hudson River Project Review

Director Klawinski,

I was at the EPA's informational meeting in Saratoga Springs last night, July 19th and wish to express my comments on the Hudson River Cleanup project and its Review.

PCBs are highly toxic and still remain pervasive in the Hudson River and the flood plains all long the river from Fort Edward to the Atlantic ocean. As you mentioned in the meeting, GE is the responsible party for mitigation. There continue to be hot spots in several places in the river and other spots in the Lower River that needs immediate action to correct....not just a watch and collect more data. Yes continue to collect data but we need additional remedial action now!! Please recommend action now: investigate and get estimates from the companies who are more technologically advanced to dredge and remove those hot spots including the old Champlain Canal, Waterford water plant area and flood plain areas including Schuylerville fields.

EPA determined that the Hudson River PCB cleanup "will be protective of human health and the environment," even though two to three times as many PCBs remain in the river than expected. Let's be clear: toxic PCBs continue to threaten people and wildlife. EPA and GE must do more.

The cleanup is already years behind schedule, and EPA claims it needs another eight years of data to understand if it is working. In short, EPA is declaring success before it has the science to back it up. One thing is for sure: New Yorkers will not be able to eat fish from the river for decades, or longer, without significant restrictions. This is unacceptable.

The cleanup is not protective and more work is needed to ensure a healthy Hudson River.

Below the Troy Dam — and all the way to Manhattan — the EPA's own studies show PCB concentrations in fish haven't declined as expected as a result of the upriver dredging.

With more PCBs left in the river than anticipated, additional dredging of the upper 40 miles of the Hudson River is necessary.

GE should be required to further investigate the lower 150 miles of the Hudson River to ensure cleanup goals are met.

EPA must give more weight to studies by federal and state agencies that challenge EPA's findings.

The cleanup cannot be declared complete by the EPA until the PCB contamination in the entire Hudson River reaches a level that does not threaten human health and the environment.

The NYS DEC representative and all of the elected officials present at the July 19, 2017 meeting declared that the cleanup and current plan are not protective and further action is immediately needed to protect the Hudson River.

Please listen to the overwhelming public response to the Review and commit to further cleanup actions as soon as possible. The health and safety of the people residing and visiting the many towns and cities along the Hudson River is at stake as well as the animals and fish who reside in and around the river.

This is the chance to make a difference and do the right thing to truly cleanup and restore the health of the Hudson River and the people of the State of New York.

Respectfully,  
John Zimmerman

[REDACTED]

[REDACTED]

7/20/2017

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July 25, 2017

EPA Region 2 Director Gary Klawinski  
U.S. EPA - Region 2  
187 Wolf Road, Suite 303  
Albany, NY 12005

My name is Juliette & I am a student living in Washington, DC. Despite this current physical separation, I grow up in Connecticut & consider the whole ~~the~~ northeastern region (New England & New York) to be my home. I am highly concerned about the current levels of pollution in the Hudson river & the <sup>larger</sup> effects on the surrounding ecosystems & people. There is no such thing as "acceptable levels of pollution"! Do your job xoxo this is

NOT CHILL

Sincerely,

Juliette

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PM 11



EPA Region 2 Director Gary Klawinski  
U.S. EPA – Region 2  
187 Wolf Road, Suite 303  
Albany 12005

12205-113678



# Protect people and wildlife, not GE

Annie Wei [REDACTED]

Wed 8/30/2017 6:12 AM

To: Gary Klawinski, Project Director, EPA <epahrfo@outlook.com>;

Aug 30, 2017

Mr. Gary Klawinski, Project Director, EPA  
US EPA Hudson River Field Office, Region 2, 187 Wolf Road, Suite 303  
Albany, NY 12205

Dear Mr. Klawinski, Project Director, EPA,

As a longtime Hudson Valley resident who loves the river, I have the following comments on the U.S. Environmental Protection Agency's (EPA's) Proposed Second Five-Year Review Report for the Hudson River PCBs Superfund Site. In summary: The Hudson is a critical resource. The PCB cleanup is not protective of human health and the environment because it is not performing as planned. You must order more dredging in the Upper Hudson River, and we need a remedial investigation/feasibility study in the Lower Hudson River as soon as possible.

EPA's review must clearly state "the remedy is not protective." In the report you admit that General Electric's (GE's) cleanup of toxic PCBs it dumped in the Hudson River does not currently protect the health of the public or the river. That should be the only finding of the report. And you must remove the phrase "the remedy will be protective." Such a statement conflicts with your agency's admissions that the cleanup is not protective now, that at least eight more years of data are needed to predict future trends with any confidence, that the short-term 5-year fish tissue goal will not be met, and that more investigation is needed in the lower 150 miles.

The Hudson River is a critical resource. The economic, recreational, cultural, and scenic value of the River form the bedrock of past development and future vitality for the Hudson Valley and New York City. Because GE dumped over a million pounds of toxic PCBs into Hudson River from 1947 to 1977, a once vibrant commercial fishing industry has been closed down, the River has become one of the nation's largest Superfund sites, and the ability of people to consume fish from the river has been significantly restricted. As demonstrated by the public outcry at EPA's information meetings on its Five-Year Review Report, New Yorkers want a healthy Hudson River as soon as possible.

The goals that EPA set to clean up the Hudson River are already weak. In the Upper Hudson River--the 40 miles north of the Federal Dam in Troy, NY--EPA expected that within 5 years of the completion of dredging, it would only be safe to eat one fish meal every two months,



and that within 16 years, it would only be safe to eat one fish meal per month. Under the cleanup plan, EPA did not expect people to be able to eat one fish meal per week for over 55 years. Because the timelines for the cleanup are so long, I expect EPA to hold GE accountable for meeting -- and not simply move the goal posts. In the meantime, I am concerned about the many people who eat fish from the Hudson River, and I urge EPA to do better outreach to subsistence and recreational fishing communities about the health risks.

There is already evidence that the cleanup will fail to meet the goals for the Upper Hudson River. Dredging was completed in 2015, and according to fish tissue data from 2016, the average concentration in the Upper Hudson River is 1.3 mg/kg. With concentrations at that level, it is almost certain that the 5-year goal of 0.4 mg/kg will not be met. Even assuming an 8% "decay rate," which is optimistic, the cleanup will miss this goal by more than 10 years. EPA should acknowledge in the report that the cleanup will very likely fail to meet this critical short-term goal, and then order GE to develop a plan of action, including more dredging if necessary, to get the cleanup back on track.

EPA's determination that the cleanup "will be protective" of human health and the environment for the Upper Hudson River is not acceptable. This determination is inconsistent with the agency's admission that the cleanup is currently not protective and with EPA's repeated statements that at least eight more years of data are needed to predict future trends with any confidence. EPA's determination is further undercut by the agency's reluctance to provide specific timeframes for reaching the short- and long-term goals. In addition, the National Oceanic and Atmospheric Administration (NOAA) recently published a peer-reviewed study suggesting that hazardous levels of PCBs will remain in fish in the Lower Hudson River for much longer than the EPA predicts. The New York State Department of Environmental Conservation (NYSDEC) has also expressed its concerns with the findings in the report, stating that the significant amount of contamination left in the river threatens both the public health and the environment. Therefore, EPA should revise its determination and recognize that the cleanup is not protective of human health and the environment.

The data show that the Lower Hudson River--the 150 miles south of the Federal Dam--is not responding as anticipated. EPA essentially admits that the cleanup is not working in the Lower Hudson River by failing to make a protectiveness determination that covers this stretch. From Poughkeepsie and continuing downstream, the decay rates (or rate of decrease in PCB concentration) in fish are not statistically different from zero. NYSDEC and the Hudson River Foundation do not expect the dredging to result in additional improvement in the Lower Hudson River. While EPA agrees that more investigation is needed, the agency has made no definite plans on how this will be done. Therefore, I urge EPA to require GE to do a full remedial investigation and feasibility study of the Lower Hudson River.

EPA should be more up front about the facts in its Five-Year Review Report. For instance, during Phase 1 of dredging, EPA discovered that it had underestimated both the depth of the PCB contamination and the concentration of PCBs in the surface sediment. Despite acknowledging that there were more PCBs present, EPA did not change the goals for the

cleanup. Instead, EPA focused on removing a certain percentage of contaminated sediment, leaving behind two to three times more PCBs than anticipated. NOAA has stated that this means that cleanup goals targets will be met up to 60 years later than expected. The public has a right to know how much PCB contamination remains in the River today, and I hope that EPA will make that information clear and accessible in its final report.

In short, EPA is hiding the ball. For the Upper Hudson River, EPA has failed to evaluate all of the signs that the cleanup will not meet its goals, and instead made a determination based on hope rather than science. For the Lower Hudson River, EPA has recognized that the cleanup is not working as anticipated, but it has failed to provide a plan for a prompt investigation and cleanup. If Administrator Pruitt's words about doing Superfund better and faster mean anything, they should cause EPA to make a "not protective" finding for the entire Hudson River Superfund Site, order GE to take more PCBs out of the Upper Hudson River, and compel GE put its imagination to work devising a cleanup for the Lower Hudson River.

Thank you for the opportunity to submit my comments.

Sincerely,

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EPA Second Draft Year Review

maria keramari [REDACTED]

Tue 8/22/2017 9:50 AM

To: Director Gary Klawinski <epahrfo@outlook.com>;

Dear Director Klawinski,

Dear EPA Region 2 Director Gary Klawinski,

The current levels of contamination in fish, sediment and water are much higher than expected and the lower Hudson River saw little benefit or impact from the dredging project. The only appropriate conclusion for these conditions is "not protective."

It is understood that the original cleanup plan anticipated that some PCBs would be left in the river. However, the EPA discovered-after the remedy was determined-that there was three to five times more contamination in the Upper Hudson than previously estimated. Despite this, the EPA did not expand the cleanup. As a result, despite six years of dredging contamination left in the river is significantly higher than expected.

Riverfront residents of mid- and downriver counties, especially those who subsist on the river's fish, face the same health threats today they did before dredging commenced. At the very least, you must undertake an immediate study of downriver contamination and plan for appropriate remedial action.

It is very clear that more data is needed to determine if fish will recover in the reasonable timeframes as agreed upon in the Record of Decision. I urge the EPA to also follow your agency's own guidance for Five-Year Reviews and include credible data and analyses conducted by New York State and federal agencies.

Sincerely,

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]