Integration of EPA and DEC Cleanup Actions

Hudson River PCBs Superfund Site

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EPA's 2002 ROD-Anticipated DEC Actions

- PCB oils leaking through the bedrock at Hudson Falls are a continuing source; control expected by 2005
- DEC Fort Edward ROD (2000) remedy will result in elimination of 004 outfall soils and sediments as a source of PCBs

ROD-Characterization of “DEC” Sources

- PCBs measured at Rogers Island are primarily derived from contamination from the Hudson Falls facility
- PCBs from Hudson Falls have a “fingerprint” that is distinct from sediment derived PCBs
- PCBs measured in the water column at the TI Dam and Schuylerville relative to those measured at Rogers Island indicate a much greater contribution from contaminated sediments

ROD-Characterization of Timing of DEC Cleanups Relative to EPA's

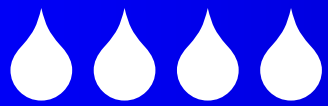
- Remediation of Hudson Falls is important to full realization of long term benefits of dredging remedy
- Given existing loads at Rogers Island remediation of other sources is not required prior to remediation of Upper Hudson sediments
- If source control is not successfully implemented at Hudson Falls under the State program, EPA will consider options under CERCLA to control the sources

2004 Review/Update of ROD Characterization

- PCBs measured at Rogers Island primarily due to Hudson Falls facility
- 1999-2002 water column data indicate somewhat lower concentrations at Rogers Island
- Deposition of solids coming into the TI Pool less than 1cm/year at concentrations below the 1ppm anticipated residual (prior to backfill)
- Loading at TI Dam and Schuylerville indicate sediment contribution much greater than upstream sources

Source Control *vs.* Sediment Total PCBs
1999 - 2002

Hudson Falls Contribution
(at Rogers Island)



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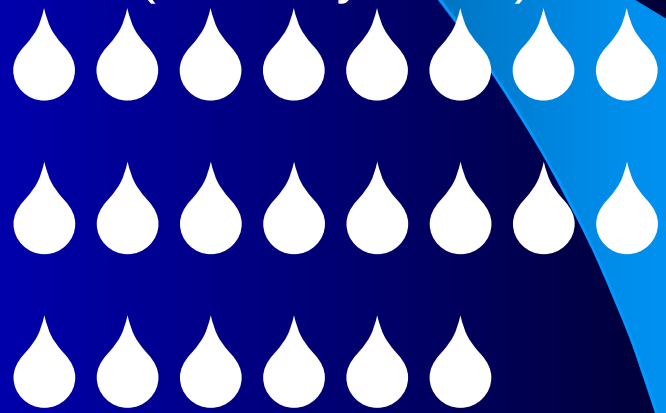
Sediment Contribution
(at Schuylerville)



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Ounces of PCBs per day

Conclusions

- The remediation of the upstream sources is necessary to realize the full long term benefits of the dredging remedy.
- Recent data reinforces ROD premise that further control of upstream sources is not required prior to the remediation of the Upper Hudson sediments.
- EPA and DEC believe it is appropriate to control the upstream sources as soon as possible.