

HUDSON RIVER PCBs SITE EPA'S PHASE I EVALUATION

Closing Presentation

Peer Review Meeting
May 4-6, 2010



Overview

1. Redistribution of suspended sediments during dredging
2. Post-remediation risks – Upper & Lower River
3. Remedy targets high value dredging areas
4. Improvements

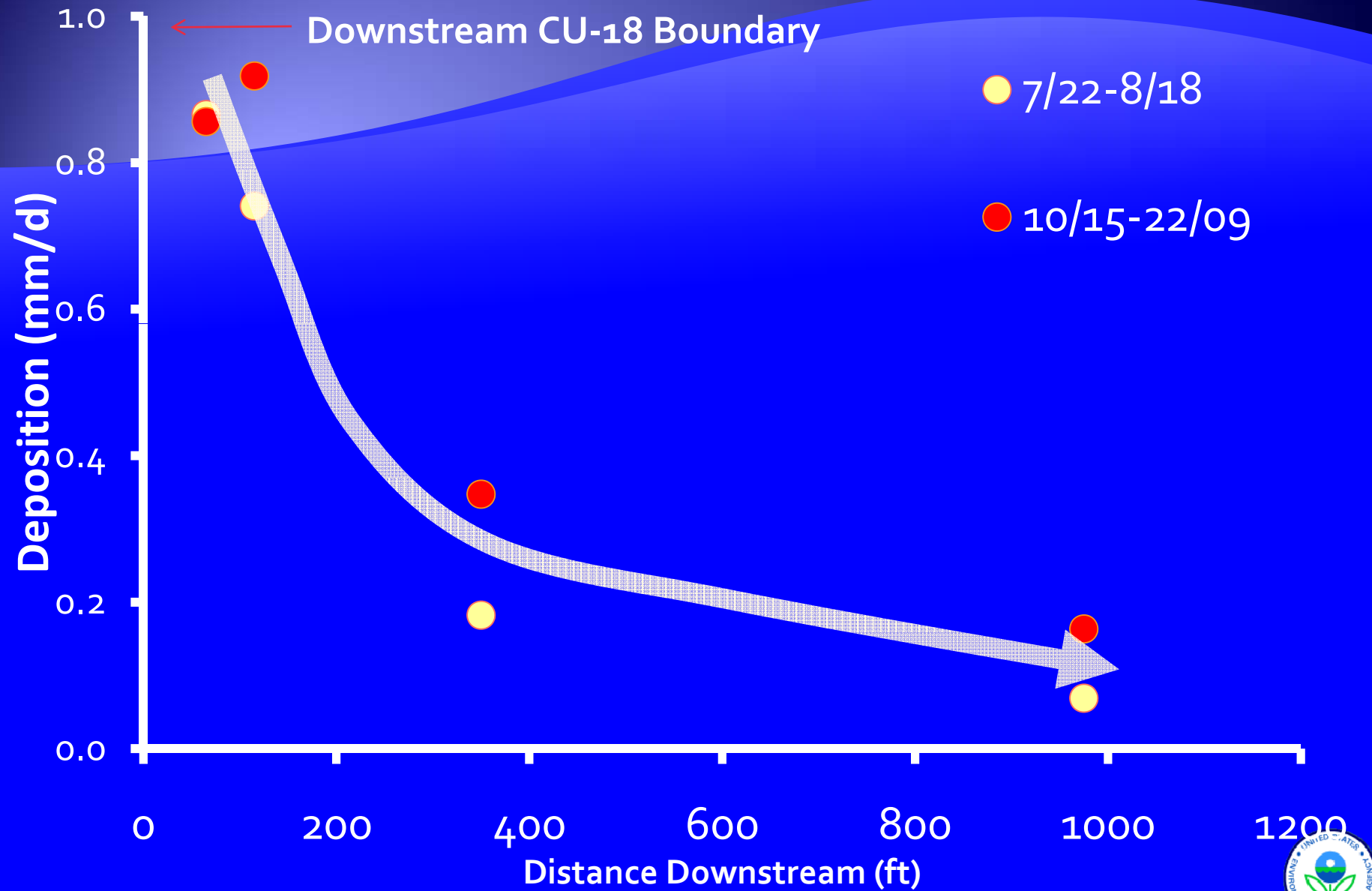


1. Redistribution of suspended sediment during dredging

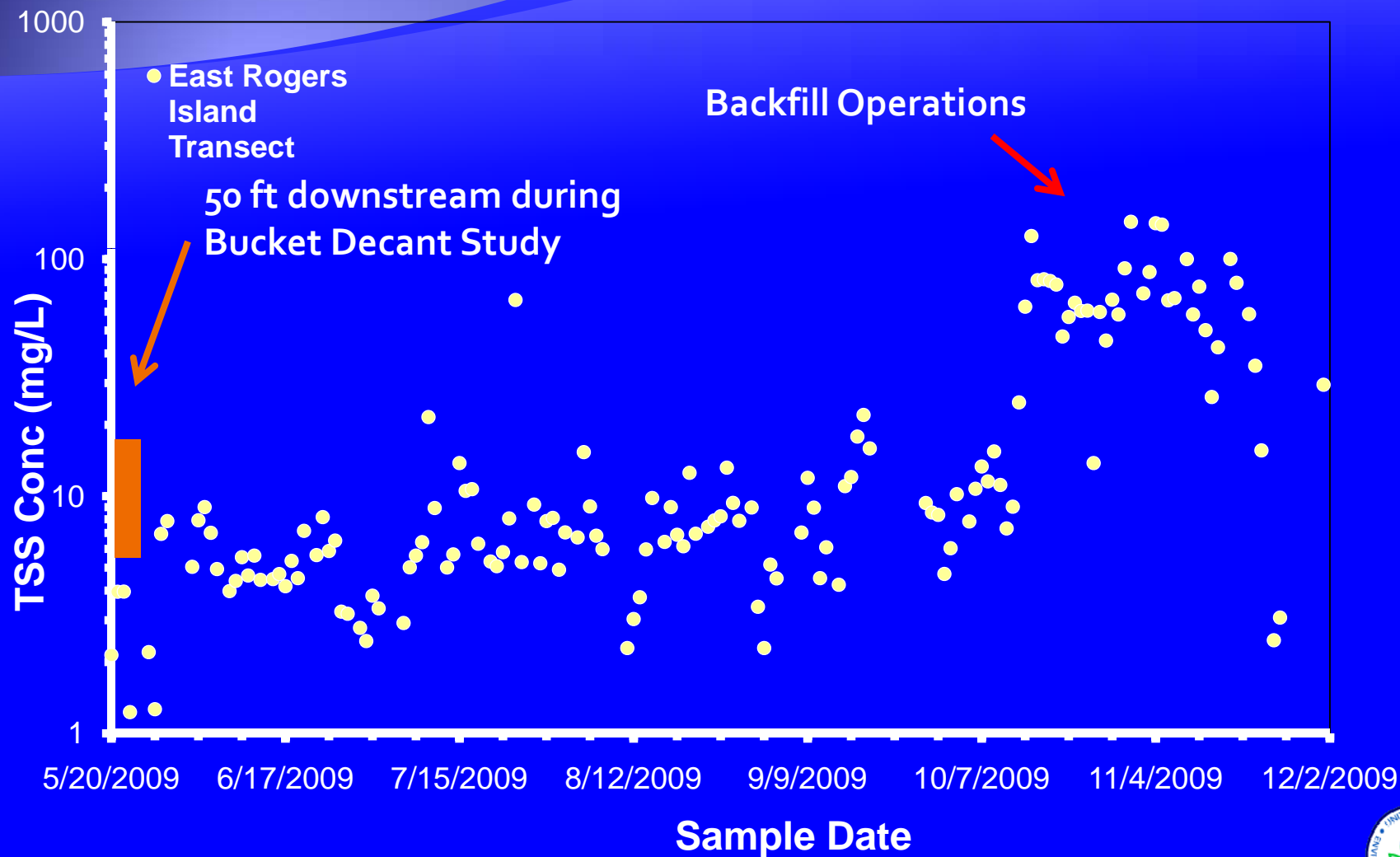
While it is important to consider suspended sediment redeposition, only limited redeposition is expected outside of the dredging footprint



Sediment Trap Data Downstream of CU-18



Near-field TSS transects



Majority of dredging-induced TSS redeposits a short distance downstream

- ◆ All available data support conclusion
 - ◆ Sediment trap data below CU-18
 - ◆ Near-field TSS data
 - ◆ Bucket decant study
- ◆ Consistent with field team observations
- ◆ Result: Limited TSS redistribution beyond dredging footprint



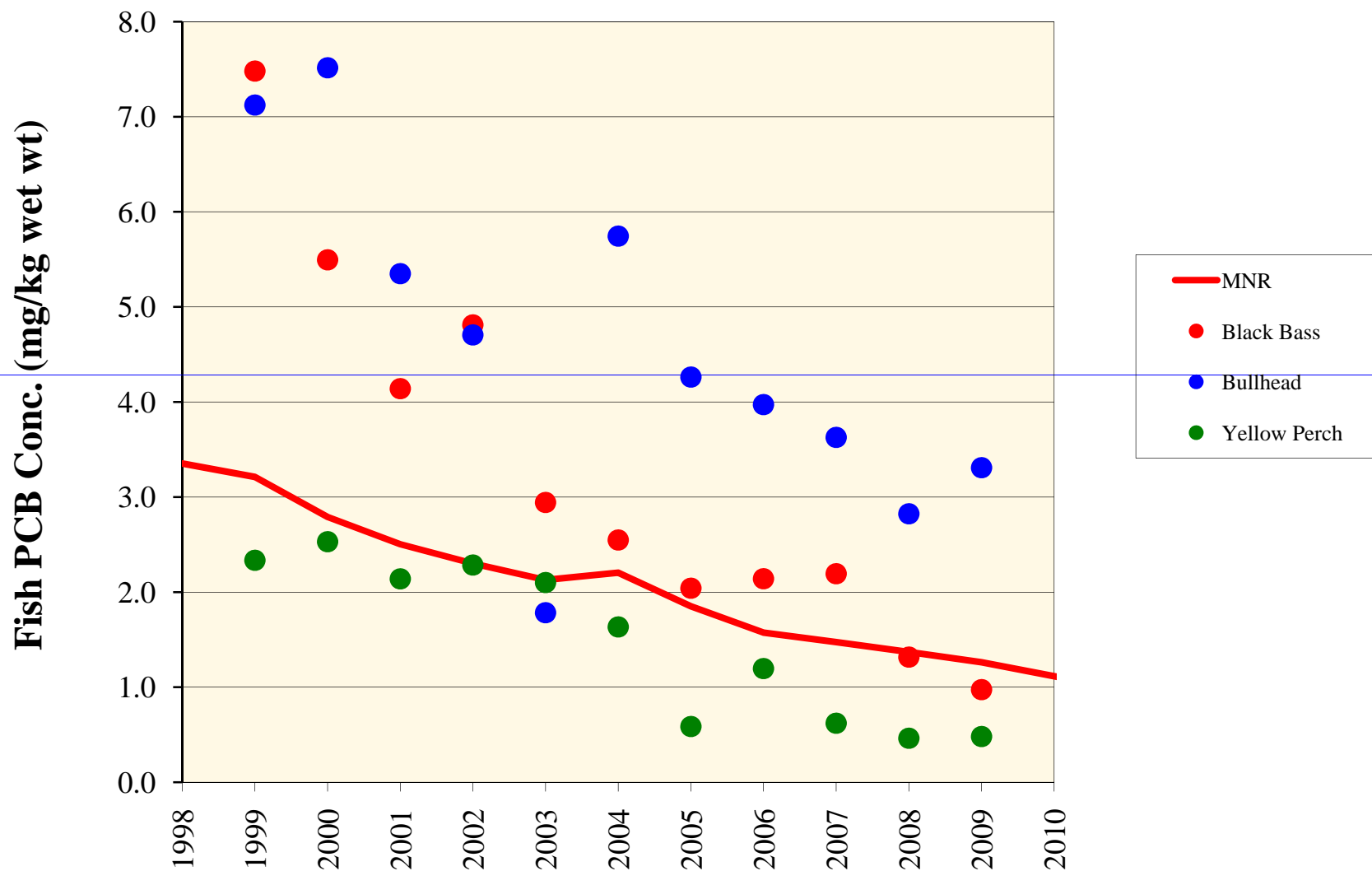
Backfill losses cover similar area



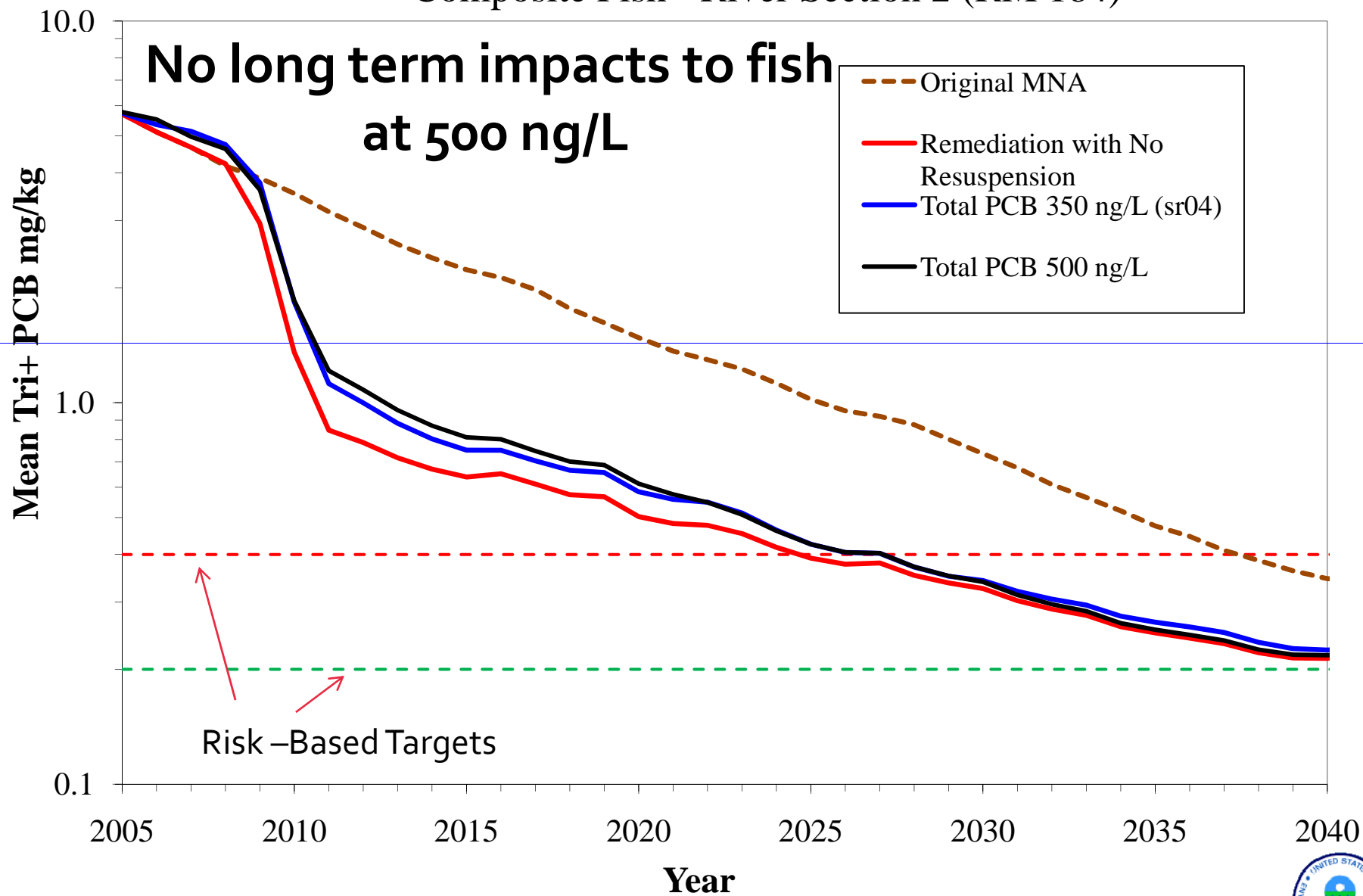
2. Post-remediation risks – Upper & Lower River



FishRand MNR and Dredging Predictions vs. Monitoring Data 1998-2009



Composite Fish - River Section 2 (RM 184)

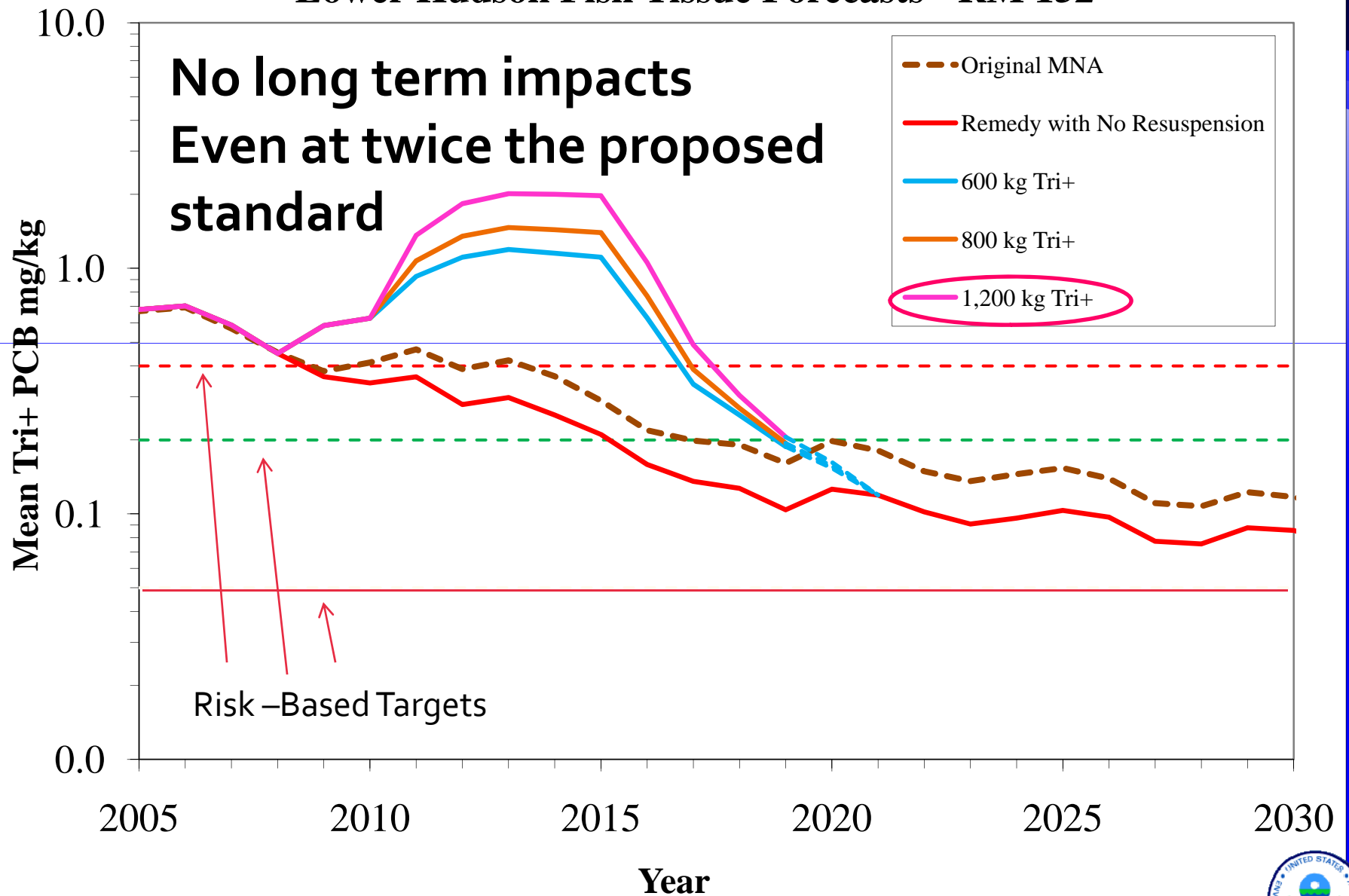


Phase 1 Water Column Concentrations

- ◆ Thompson Island = 212 ng/L
- ◆ Lock 5 (Schuylerville) = 153 ng/L
- ◆ Waterford = 74 ng/L



Lower Hudson Fish Tissue Forecasts - RM 152



Effects of PCB concentrations on fish are short term and expected

- ◆ Phase 1 data showed small increases in fish body burdens in downstream regions
- ◆ Modeling was completed to predict fish body burden increases during dredging for a range of concentrations
- ◆ Forecasts indicate negligible changes in time to risk-based targets



3. EPA has already chosen high value dredging targets

- ◆ ROD selected priority areas for dredging
- ◆ “REM 3-10-select” effectively uses 30-90-90 mg/kg criteria by river section
- ◆ Sequestered inventory will remain in RS 3



4. Improvements

- ◆ Use larger buckets where feasible (> 5 CY)
- ◆ Scow unloading
- ◆ Minimize time dredged areas left open
- ◆ Near-field monitoring – PCBs & TSS
- ◆ Monitoring diagnostics
- ◆ Address DoC uncertainty
- ◆ Re-examine dredging tolerances
- ◆ Practicable improvements found in Field Oversight Report



It will be practicable to consistently and simultaneously meet EPA's proposed Performance Standards for Phase 2

- ◆ Resuspension shown to be associated with controllable operational factors
- ◆ Adjusted load standard more realistic for actual PCB inventory; acceptable risk
- ◆ Provision of alternate public water supply alleviates need for automatic shut-downs
- ◆ Fixing scow availability issue will increase productivity and reduce resuspension



It will be practicable to consistently and simultaneously meet EPA's proposed Performance Standards for Phase 2

- ◆ Increasing scow loads will reduce vessel traffic and dredging time...and thus resuspension
- ◆ Residuals standard was effective at minimizing residuals and undredged inventory
- ◆ Address DoC uncertainty for more efficient dredging (fewer passes)
- ◆ Streamlined residuals standard will result in faster CU closure

