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September 18, 1990

**Federal Express To:**  
Mr. Constantine Sidamon-Eristoff  
Regional Administrator  
Region II  
United States Environmental  
Protection Agency  
26 Federal Plaza  
New York, NY 10278

**Re: Hudson River PCB Superfund Site**

Dear Mr. Sidamon-Eristoff:

Since our July meeting, my staff has also been evaluating technical issues which may arise in the RRI/FS. I understand that EPA technical personnel are currently working with a contractor to consider the proper scope of work ("SOW") for the RRI/FS. In order to shorten the process for developing the SOW and proceeding with the RRI/FS, I wanted to make you aware that our technical staff believes there are significant gaps in the data concerning PCBs in the Hudson which are essential to the evaluation of remedial alternatives.

A description of a few of our general findings may help put the importance of this data issue into perspective. As you will recall, the NPL site is the area of the River north of the Troy Dam, comprising approximately 40 miles. The most recent data for the greatest portion of this area were developed during the 1977-1979 period. There is only a small portion of the upper River, approximately five miles within the Thompson Island Pool, for which somewhat more recent data were taken in 1984-1985. However, even for this five-mile stretch, the data are insufficient and subject to question. For example, the 1984-1985 data are inconsistent with the 1977-1979 data in almost all measurements of PCB concentrations. In addition, there were serious statistical flaws in the analysis of the 1984-1985 data, not the least of which was the exclusion of non-detect values for PCBs in the final calculations. There was also a failure to take into account River flow directions in analyzing the data.

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Our data review demonstrates that although concentrations of PCBs in the upper River sediments have apparently decreased during the five-year period between data gatherings, at least for the five-mile stretch of the River, meaningful conclusions about the presence, amount, and transport of PCBs cannot be drawn from the two sets of data alone. Using such old data is a problem in dealing with a dynamic marine environment. Our consultants tell us it will not be possible to evaluate remedies for the River, whether they be dredging, bioremediation, or other technologies, if we do not know where the PCBs are and in what amounts.

Other data gaps exist in addition to the basic questions of locations and concentrations of PCBs in the River. There is no comprehensive data describing the site from an ecological standpoint. Consideration of any possible remedial alternatives would have to include analyses of the impacts, both positive and negative, of each remedial alternative upon the River bottom and the resident marine life. Furthermore, data relating to PCB bioavailability and toxicity within the River are not current or complete and will be necessary to enable anyone doing the RRI/FS to perform an accurate risk assessment.

I fully understand EPA's desire and need to have the RRI/FS performed as promptly as possible. The final product, however, must be one that all parties can rely upon with confidence. In our view, the data gaps described above should be filled as part of the RRI/FS. As I indicated during our last meeting, GE is willing to perform and strive toward completion of the necessary studies within the Agency's desired schedule. We believe that much of the necessary data can be collected during the next year provided we act cooperatively and promptly.

My staff would be pleased to discuss with EPA technical officials or EPA's contractor how the necessary data can be collected. We would also welcome a meeting to discuss how GE can assist in assuring maximum public participation in the reassessment process.

I look forward to hearing from you.

Sincerely,

  
Stephen D. Ramsey

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