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December 3, 1991

Douglas J. Tomchuk
Remedial Project Manager
U.S. Environmental Protection Agency
Emergency and Remedial Response Division
26 Federal Plaza - Room 747
New York, New York 10278

Re: Reduced Potency of Lower Chlorinated PCB Homologs

Dear Mr. Tomchuk:

In the General Electric Company's (GE's) comments on the Phase I Hudson River report we reported what we believed was significant information that would allow you to assign lower toxicity values to lower chlorinated mixtures of PCB's. We recently came across information that shows not only is this not without precedent but the EPA itself adopted such an approach.

As part of the rule for inadvertent generation of PCB's under TSCA, EPA agreed with a proposal that "discounted" the amount of monodichlorobiphenyl by a factor of 50 and dichlorobiphenyl by a factor of 5. This was based on the demonstrated lack of persistence, uptake and occurrence of these types of PCB's. The proposal submitted by parties outside of EPA and subsequently adopted by the EPA is enclosed. This proposal was submitted by a unique coalition of parties comprised of the Environmental Defense Fund, Natural Resources Defense Council and the Chemical Manufacturers Association.

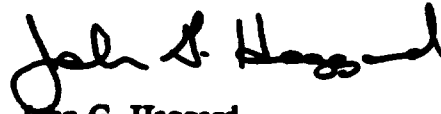
This is a very important issue for the Hudson River project since the demonstrated occurrence of the anaerobic dechlorination has preferentially reduced the amount of chlorination of the PCB's resulting in larger proportions of mono- and di-chlorobiphenyls. We, again, urge EPA Region II to evaluate the use of reduced toxicity values for lower chlorinated PCB's not only due to the results of the recent rat slide reread, but also due to the fact other programs of EPA have adopted such an approach.

HRP 002 0737

Mr. Douglas J. Tomchuk
U.S. EPA
12/3/91
Page 2

Please contact me at (518) 458-9108 if you have any questions. Please place a copy of this letter and the enclosure in the site administrative record.

Very truly yours,



John G. Haggard
Technical Project Manager

Enclosure

cc: Neil Shifrin, Gradient (w/ enclosure)
Al D'Bernardo, TAMS (w/enclosure)

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