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March 29, 1991

Hand Deliver To:

**Douglas J. Tomchuk, Project Manager
Eastern New York/Caribbean Section II
United States Environmental
Protection Agency
Jacob K. Javits Federal Building
New York, NY 10278**

Re: Hudson River PCB Site Reassessment RI/FS

Dear Mr. Tomchuk:

Enclosed are GE's comments on the Reassessment Phase 1 Work Plan. Consistent with your letter of March 6, 1991, I would like an opportunity to discuss GE's comments and the comments of other parties at the first meeting of the Oversight Committee next Thursday in Poughkeepsie. In addition to that discussion, GE's comments should be placed in the formal administrative record.

In briefest form, GE's overall comments can be summarized as follows:

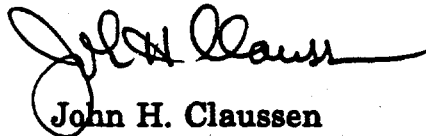
1. The Work Plan violates specific requirements of the National Contingency Plan and associated EPA guidance regarding the collection of data and the sequencing of RI/FS tasks. It fails to provide for the collection of essential data before the site is characterized and risks are assessed.
2. If tasks are performed in the order and in the depth described in the Work Plan, they will result in findings and conclusions which are scientifically indefensible. Specific data gaps are identified in GE's comments as well as new data which clearly demonstrate that earlier data do not accurately describe the current condition of the site.
3. The risk assessment, regardless of when it is performed, must consider crucial new scientific evidence on PCBs generally and in the Hudson River. That evidence is also described in the attached comments.

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Although EPA characterizes Phase 1 as a preliminary phase to be followed by more detailed efforts, the importance of Phase 1 cannot be overstated. The Hudson River is a site of tremendous importance and complexity. In its refusal to allow GE to perform the reassessment, EPA committed itself to performing the best possible and most objective reassessment. The foundation of that reassessment is, by definition, Phase 1. Yet, the Work Plan which has been distributed for review is extraordinarily deficient. It violates EPA's own regulations, relies on old data, and will result in invalid scientific conclusions.

Sincerely,



John H. Claussen

Enc.

cc: John J. Szeligowski (w/enc.)
David E. Merrill (w/enc.)
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