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April 11, 1997

Mr. Douglas Tomchuk
U.S. Environmental Protection Agency
Region II
290 Broadway, 20th Floor
New York, New York 10007-1866

RE: DEIR Comments

Dear Mr. Tomchuk

General Electric Company ("GE") is pleased to submit these comments on EPA's February 1997 Data Evaluation and Interpretation Report ("Report") for the Hudson River PCBs Reassessment Remedial Investigation/Feasibility Study.

Recent technical meetings between the Agency and its contractors and GE and its contractors have been extremely helpful and productive in clarifying and resolving critical issues. Our comments would have been more extensive but for this dialogue. We believe there needs to be an ongoing dialogue to both share and test various technical positions developed as the reassessment continues.

The reaction of the public to the release of the Report - and particularly to its Executive Summary - suggests that it was taken to be a completed Remedial Investigation ("RI"). Of course, it does not meet that description. There are important conclusions that are stated so broadly that they are not helpful in the context of remedial analysis. For instance, a major source of PCBs at the Thompson Island Dam is identified as the sediments of the Thompson Island Pool, but the particular class or category of sediments is not identified as it must be for useful analyses in the remedial context. Other conclusions focus on one aspect of an issue while neglecting other equally or more important aspects. The remedial importance of dechlorination is limited to discussion of reduced PCB mass, ignoring reduced toxicity and bioaccumulation. The half of the annual load of PCBs which is perceived to originate in the Thompson Island Pool sediments is analyzed at length, the half originating near the Hudson Falls plant site is given short shrift. Data issues essential to remedial analyses are left unaddressed or glibly brushed

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aside: what is the present and future load coming from recent releases near the Hudson Falls site and what is the fate of such releases in the Thomspon Island Pool?

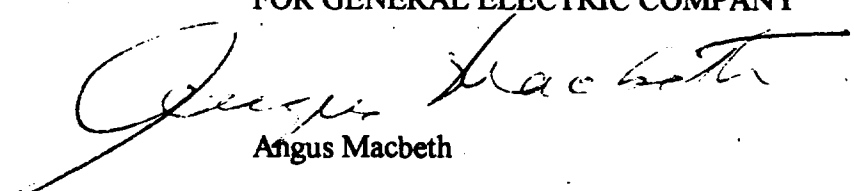
In short, despite the very considerable effort that clearly has gone into the development of this Report, a great deal of very important work remains to be done. Most important, interpretation of data must be tested in the context of rigorous fate and transport modeling which will constrain interpretations with consistent and plausible mechanisms.

We are continuing to review the Report and encourage the Agency to consider any additional comments we may have in the context of our continuing dialogue. We believe that with ongoing cooperation and exchange of data analyses and modeling approaches, the final outputs can result in an RI that forms a sound basis for selecting and testing remedies that are based on the realities of PCB fate and transport in the Upper Hudson.

Please place a copy of these comments in the Administrative Record for the site.

Sincerely,

FOR GENERAL ELECTRIC COMPANY



Angus Macbeth

cc: Richard Caspe (USEPA Region II)
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