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Callahan,
cc: Pavlon/action*

Stephen D. Ramsey
Vice President-Corporate Environmental Programs

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March 23, 1994

William Muszynski
Acting Regional Administrator
U.S. EPA, Region II
26 Federal Plaza
New York, NY 10278

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REGIONAL OFFICE
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DIRECTOR'S OFFICE

Dear Bill:

You will recall that we briefed you on the upstream source of PCBs in the Hudson River more than a year ago. The discussion touched on the chemical composition of PCBs and our investigation which tracked the source of the elevated PCB levels in the River to the area around the abandoned Allen Mill structure, adjacent to the Hudson Falls plant site. Since that time, we have undertaken a large and significant effort to correct the problem. The magnitude of this project is startling: roughly 30 tons of PCBs, contained in 2100 tons of contaminated sediments and debris have been removed -- much of it non-biodegraded PCBs with a high potential to bioaccumulate in fish. In the last year alone, we have spent \$3 million to remove PCBs from the area near the Hudson Falls Plant, bringing our total Hudson River PCB research and remediation expenditures to about \$50 million since 1984. Included in this number is \$18 million for capping the remnant deposits, completed at EPA's direction in 1991.

We have presented data to your agency which, we believe, demonstrates that the PCBs in the Allen Mill have been the governing influence on PCB levels in fish in the upper Hudson since at least the mid-1980's. Elimination of this source, which is the goal of GE's remedial project, should produce significant improvements in the fishery over the next several years. We are concerned that the primary focus of EPA's Reassessment continues to be the old sediments, which are largely dechlorinated and of lesser importance because of their reduced potential to accumulate in fish and their diminished toxicity. Virtually no attention is being given to the contribution of the 30 tons of PCBs removed from the Allen Mill to PCB levels in the Hudson and its fish population and what removal of that source will mean. I am, therefore, concerned that when it is time to write the ROD, EPA may reach conclusions that are invalid.

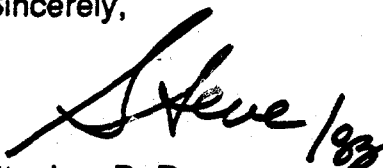
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We have never had an opportunity to review this work with senior agency officials. We would appreciate an opportunity to give you and your staff a complete briefing on the work that we have done in this area, and its implications for future conditions in the River. We would prefer to hold this briefing on-site but would do so in New York City if that is necessary, at your earliest convenience. Given the importance of these issues, we hope we will be able to present this information to you and your staff and, in so doing, enhance our collective understanding about the River.

Sincerely,



Stephen D. Ramsey

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cc: Elliott Laws
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