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Ms. Kathleen C. Callahan
Acting Deputy Regional Administrator
USEPA, Region II
26 Federal Plaza
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DIRECTOR'S OFFICE
ENVIRONMENTAL
RESPONSE CENTER

Dear Kathy:

Thanks to you, George and Bill for your time. I will ask Barbara Perry in our office to call and arrange a date in May when we can provide a tour and briefing concerning the work we are doing at Hudson Falls and the Allen Mill. As I mentioned when we met, we have removed approximately 30 tons of PCBs from the Mill, which is in direct contact with the River. There is also a great deal of additional work in progress that we want to be sure you understand.

I am appreciative of your offer to hold periodic discussions on issues connected with the project, because I feel that this is the best route to a sound technical conclusion. Doug Tomchuck has written to request a meeting in early May on PCB fingerprinting, and we scheduled that for May 5th. At your earliest convenience, we would also like to schedule a meeting on risk assessment.

As you know, GE has collected and analyzed enormous amounts of field data and developed a large volume of laboratory research concerning the toxicity of PCBs and the fate and transport of PCBs in the Hudson River, which has been provided to EPA. We believe that we have a significant contribution to make to the discussion on the outcome of the Hudson River Reassessment. We appreciate the opportunities you have created for us to make technical presentations, but there has been no meaningful opportunity at these meetings to hold a technical dialogue with EPA. I hope that during the forthcoming meetings we can create the dialogue.

I am also appreciative of the interest you all took in the other concerns I expressed at our meeting last week. I left feeling that -- to the extent you are able to do so -- our concerns will be addressed.

We are particularly concerned about the following areas:

-- Public Participation: The last opportunity for formal public comment on any of EPA's work occurred almost two years ago, during June 1992, when the Phase Two Work Plan was released. We believe that there are many documents and reports that will be integral to the decision on the Reassessment, and which should be the subject of public comment before the agency goes forward. For example:

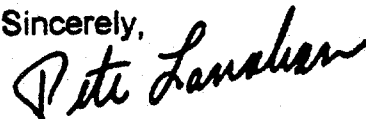
-- We are informed that EPA may defer comment on the Phase Two Report, containing the Risk Assessment and Modeling results, until the Feasibility Study Report and Proposed Plan is provided to the public. According to the EPA schedule as we know it, comment will therefore not be taken on this Report until the Spring of 1995. Given the importance of the conclusions that will be contained in the Phase Two Report we request that the Report be released for comment and response well before completion of the Feasibility Study Report and Proposed Plan.

-- We have already expressed our strong objection to EPA's decision to begin development of the Feasibility Study Report without soliciting public comment on the Phase Three Scope of Work.

-- EPA has begun work on its Hudson River model without considering public comment on its assumptions and methodology. GE objected to this procedure at the Public Meeting that was held in New Paltz last year, citing the need for public discussion of the work before it began. The opportunity to take comment on the assumptions and methodology has presumably come and gone, although we appreciated the recent public informational meeting on the work that is being done. However, we would appreciate periodic updates and opportunities to interact with your technical team on this topic.

Once again, I would like to thank all of you for taking the time to meet with me. This is a complicated project with many stakeholders, and I feel that an open dialogue would serve all interests best. I look forward to our meeting in May at the Hudson Falls site, and the meetings on PCB fingerprinting and risk assessment.

Sincerely,



M. Peter Lanahan, Manager
Hudson River Project