



**GE Corporate
Environmental Programs**

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July 30, 1998

Mr. Damien Hughes
USEPA Region II
290 Broadway, 20th Floor
New York, NY 10007

Re: Peer Review Panel - Preliminary Model Calibration Report

Dear Mr. Hughes:

I am writing to express my concerns about the panel selected by EPA to conduct the peer review of EPA's Preliminary Model Calibration Report ("PMCR").

General Electric Company ("GE") is concerned that, although the panel is comprised of distinguished scientists, the individuals on the panel do not possess the right expertise for review of the PMCR. This problem appears to have resulted from the method used to select possible participants in the peer review process. The documents obtained from EPA through our Freedom of Information Act requests indicate that EPA's contractor, Eastern Research Group ("ERG"), searched for scientists with expertise in PCB issues. By focusing solely on individuals with "PCB" expertise, ERG's methodology potentially excluded individuals with the right sort of expertise to conduct a rigorous and independent analysis of the PMCR.

As you are aware, the PMCR is an interim report describing the status of the Agency's fate, transport and bioaccumulation models. The models are intended to be used to predict the effectiveness of various remedial options, including no-action, in reducing human health risks. Specifically, the models are to be used to see whether a particular remedial option will achieve "safe" levels of PCBs in fish appreciably faster than no-action. The PMCR does not address issues of PCB toxicology or risks to human health or the environment. It is a highly technical report describing the specific assumptions, data, and formulae used by EPA to model the movement of PCBs and sediments in the upper Hudson River, the bioaccumulation of PCBs in fish in the upper Hudson, and the Agency's plans for calibrating and testing these models. Given this focus, a peer reviewer must have specific experience with developing and interpreting fate and transport models in river systems and/or bioaccumulation models in order to conduct the in-depth analysis contemplated by the peer review process.

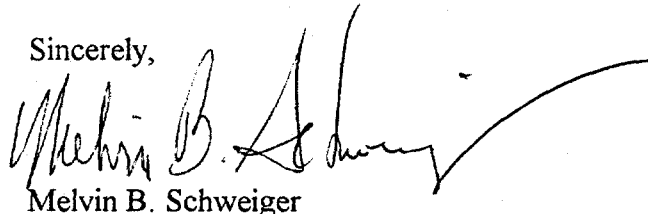
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Our review of the individuals selected to conduct the peer review, however, indicates that they may not possess the appropriate qualifications. I do not intend to suggest that these individuals are not fine and independent scientists, but rather that their education and training do not make them experts in the areas covered by the PMCR. To GE's knowledge, there are many other highly qualified "modeling" experts who do possess the necessary qualifications and who are completely independent of GE and EPA. We would be happy to provide the names of such experts if you desire.

GE understands that it may be too late to change the composition of the PMCR peer review panel. Nevertheless, GE urges EPA to reconsider the method for selecting peer reviewers to ensure that the individuals with the right qualifications are selected to review each Phase II report. GE also requests that EPA consider using different individuals, with greater expertise in riverine fate and transport modeling, to conduct the review of EPA's Baseline Modeling Report.

I look forward to hearing your response.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Melvin B. Schweiger', with a long, sweeping horizontal line extending to the right.

Melvin B. Schweiger

cc: Richard Caspe
William McCabe
Mei Hauptman
Doug Tomchuk