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January 5, 1999

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

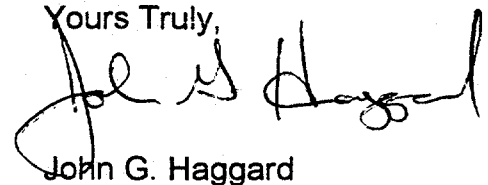
Re: Peer Review

Dear Mr. Hughes:

Find enclosed questions GE believes should be posed to the panel convened to perform a scientific peer review of the Data Evaluation and Interpretation and Low Resolution Coring Reports. While your letter of December 2, 1998 to the Liaison Group members, requested these questions be submitted by December 21, 1998, we did not receive a copy of this letter until December 28. We are not a member of the Liaison Group.

If you have any questions, let me know. Please place a copy of these questions in the Hudson River Site Administration Record.

Yours Truly,



John G. Haggard

cc: Doug Tomchuk, USEPA
Ann Rychlenski, USEPA
William Ports, USEPA

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Questions for the DEIR and Low Resolution Core Report Peer Reviews

DEIR

- Are the report's conclusions adequately supported by the data and discussion presented in the body of the report?
- Can the data support alternate conclusions?
- Does the use of biased data at the Thompson Island Dam compromise any of the report's conclusions?
- Does the fact that the data presented in the report conclusions were collected during the period of exceptionally high PCB releases to the river affect the general applicability of the conclusions?
- Are the report conclusions consistent with all available evidence, including other data and current understanding of PCB transport mechanisms (e.g., resuspension, diffusion, etc.)?
- Is the conclusion that the PCB water load is conservatively transported from the Thompson Island Dam to the Lower Hudson consistent with known PCB fate mechanisms and the relative magnitude of surface sediment PCB levels in the 34 miles between the Thompson Island Dam and the Troy Dam?
- Do data collected since the EPA Phase 2 study confirm or contradict any of the conclusions in the report?
- Is the approach used to evaluate dechlorination sufficient to support the conclusions regarding the extent and threshold of this process?

Low Resolution Core Report

- Does the uncertainty of the estimate of the PCB mass in Thompson Island Pool in 1984 compromise the effort to estimate mass change using the Low Resolution Coring approach?
- What is the significance of the variation among replicate PCB analyses to conclusions about mass change?

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- Should the mono- and dichlorobiphenyl components be subtracted from the 1994 data prior to comparison with the 1984 data so that the same measure of PCBs (i.e., tri- and higher) are compared?
- Is the subset of 1984 samples used for comparison to the 1994 cores representative of the overall population of 1984 samples? If not, how does this fact impact conclusions about mass change?
- Is the approach of treating 1984-94 core-pair comparisons as spatial replicates reasonable given the differences in sampling location and the observed spatial variability?
- Is it reasonable to compare grab samples collected in 1984 with core samples collected in 1994?
- Are the conclusions drawn from the data analysis consistent with known fate and transport processes and other independent assessments of PCB fate (e.g., water column monitoring over the same period)?
- Is it reasonable to use non-detect beryllium 7 results to infer lack of burial given the timing of sampling and analysis in relation to the likely timing of solids deposition in the Hudson River?
- Is the uncertainty inherent in the data analysis sufficiently explored in the document, adequately communicated in the executive summary, and appropriately reflected in the conclusions?