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April 28, 2000

Robert Willes, Ph.D.  
Director and Senior Vice President  
Cantox Environmental Inc.  
2233 Argentia Road, West, Suite 308  
Mississauga, Ontario L5N 2X7 Canada

**RE: Hudson River PCBs Superfund Site: Human Health Risk Assessment  
Peer Review**

Dear Dr. Willes:

In anticipation of the upcoming peer review of EPA's Human Health Risk Assessment for the Upper Hudson River, I enclose for your consideration a short report concerning Charge Question 5. The report was prepared by Dr. Russ Keenan of Ogden Environmental and Energy Services on GE's behalf, and addresses EPA's use of Monte Carlo Analysis in the risk assessment process.

I am sending you this Report because the proper use of Monte Carlo analysis is critical to provide a more realistic assessment of risks to anglers from fish consumption and allow the risk manager and the public to understand more fully the uncertainty associated with the risk estimates. In addition, as Dr. Keenan's report explains, EPA's Responsiveness Summary fails to address many of these critical issues associated with the Agency's use of Monte Carlo Analysis or to respond in a meaningful manner to suggestions made by GE to improve the Monte Carlo Analysis approach taken in the risk assessment.

I hope that you find this report useful as you complete the peer review process. If you have any questions, please do not hesitate to contact Dr. Keenan (207-879-4222) or myself (518-862-2739).

Yours truly,

John G. Haggard

JGH/bg

Enclosure

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cc: Alison Hess, U.S. EPA  
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