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May 9, 2000

Lee Shull, Ph.D.
Principal/Director
Health & Risk Services Program
NewFields, Inc.
1550 Harbor Blvd., Suite 130
West Sacramento, CA 95691

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

Dear Dr. Shull:

In follow-up to our earlier correspondence regarding the upcoming peer review of EPA's Human Health Risk Assessment for the Upper Hudson River, I am forwarding some additional information that you may find illuminating in your deliberations.

As you are aware, EPA's risk assessment document provided a review of the PCB cancer mortality study published by Dr. Renate Kimbrough in March 1999. EPA concluded that because of a number of purported limitations, the study will not likely change the Agency's conclusions regarding the health effects of PCBs. Although GE and others submitted significant comments and requested that EPA provide the technical justification for its statements, the Responsiveness Summary did not adequately address the issue.

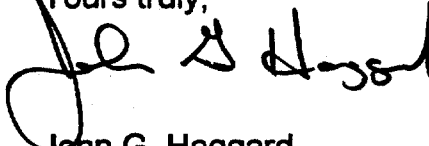
To assist in its review of the Kimbrough study, the Agency solicited input from several independent experts. Through a Freedom of Information Act request, we received a copy of the materials submitted to the EPA by outside experts. After reviewing the input that EPA had received from outside scientists we became concerned that EPA may not have considered all of the feedback it had received. Among the materials received by EPA is a letter from Dr. Thomas Mack of the USC Norris Comprehensive Cancer Center relating his comments on the Kimbrough study to Dr. James Coglianor of EPA. Contrary to the "limitations" identified by EPA in the risk assessment report, Dr. Mack "found the Kimbrough paper to be well designed, appropriately analyzed, and fairly interpreted". Dr. Mack went on to agree with the summary statements of the study and further states "that it is appropriate to downgrade the priority given to PCB's". Dr. Mack is not currently nor has he ever been retained by GE or on GE's behalf.

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I hope that you find this information useful as you continue the peer review process. If you have any questions, please do not hesitate to contact me at 518-862-2739.

Yours truly,



John G. Haggard

JGH/bg

Enclosure

cc: Alison Hess, U.S. EPA
William McCabe, U.S. EPA
Douglas Tomchuk, U.S. EPA
Douglas Fischer, U.S. EPA (ORC)
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