



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

JACOB K. JAVITS FEDERAL BUILDING
NEW YORK, NEW YORK 10278

NOV 19 1990

Mr. Michael J. O'Toole, Jr., P.E.
Director
Division of Hazardous Waste Remediation
New York State Department of
Environmental Conservation
50 Wolf Road
Albany, New York 12233-7010

Re: Hudson River PCBs Site - Reassessment RI/FS

Dear Mr. O'Toole:

In response to your letter dated July 13, 1990, I would first like to thank you for clarifying that the Central Projects Section will be the point of contact for the New York State Department of Environmental Conservation (DEC) with respect to the Reassessment Remedial Investigation and Feasibility Study (Reassessment RI/FS) for the Hudson River PCBs site. By acting in this capacity, it is assumed that the Central Projects Section will be responsible for disseminating information to, and collecting information from, the DEC Project Sponsor Group, the New York State Department of Health, and the other divisions in DEC. The U.S. Environmental Protection Agency (EPA) will keep your project manager informed of all pertinent aspects of the project, as we do at all Federal-lead sites.

Your second comment requests that the Reassessment RI/FS include the upland disposal areas, which EPA assumes to be the areas outside of the normal river channel where dredged sediments were placed. However, EPA's position regarding these upland areas has not changed. The Hudson River PCBs National Priorities List (NPL) site, as listed in September 1983, did not include the upland disposal areas, and thus, the Reassessment RI/FS will not evaluate remedial alternatives for the upland disposal areas. This point was included in a handout distributed at the March 12, 1990 meeting with General Electric, which was attended by Lang Marsh, and was the subject of discussion between our respective project managers following that meeting.

In addition, I am informed that EPA and the New York State Department of Transportation (NYSDOT) are conducting negotiations for a settlement agreement which would provide for NYSDOT's performance of certain remedial measures to address the Buoy 212 and Special Area 13 landfills, which are part of the upland disposal areas.

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I would also like to note that the Reassessment RI/FS does not at this time include a reevaluation of remedial actions for the remnant deposits. However, should the Reassessment RI/FS conclude that additional action with respect to the sediments appears appropriate, the scope may be expanded to address reevaluation of the remnant deposits prior to a Record of Decision being issued. It should be noted that the September, 1989 Administrative Order on Consent requires General Electric to conduct a Remnant Deposit Characterization and Remedial Technology Review (RTR) for the remnant deposits. EPA will notify GE to begin the RTR in the near future.

The Reassessment RI/FS will be a comprehensive evaluation of alternatives to address the PCB-contaminated sediments in the river. A Scope of Work for the Reassessment RI/FS was forwarded to your staff for comments in early October. Once the scope of work is finalized, a Work Plan for the first phase of the Reassessment RI/FS will be developed.

If you have any questions, please feel free to contact me at (212) 264-8672, or have your staff contact Douglas Tomchuk at (212) 264-7508.

Sincerely yours,



Richard L. Caspe, P.E., Director
Emergency and Remedial Response Division

cc: E. Sullivan, NYSDEC
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