



Corporate Environmental Programs
General Electric Company
Computer Drive South
Schenectady, NY 12305
Tel: 518 456 9247

General Electric Co. Preliminary Comments
on EPA's Phase II Work Plan and Sampling Plan
Hudson River PCBs Reassessment RI/FS
Columbia-Greene Community College
June 18, 1992

General Electric Co. is pleased to have this opportunity to comment on EPA's Phase II work and Sampling Plan for the Hudson River PCBs reassessment. GE will submit more extensive comments on the Phase II plan after further review.

Throughout the reassessment process, GE has urged EPA to gather and analyze the best scientific information about every aspect of the river and to consider the whole picture, rather than any one piece of data, before rendering a decision. An informed final decision must balance the continuing natural improvements in river conditions and the environmental and social consequences of various remedial options.

Since the last Hudson River Oversight Committee meeting, several positive developments have underscored the continuing improvements in river conditions:

-- The New York Department of Environmental Conservation reported that average levels of PCBs in striped bass in the lower river estuary dropped 50 percent between 1980 and 1990. The average 1990 concentration of 2.8 parts per million points to the likelihood that PCB levels will drop below the FDA limit in the next two to four years.

-- DEC reported in September that the mean PCB concentration in striped bass from the New York Marine District was below 2 parts per million, and the agency is now considering a partial reopening of the commercial fishery in the Marine District. The declines in PCB levels in striped bass also prompted the New York State Health Department to relax fish-consumption advisories in April.

-- GE has completed and made public a peer-reviewed research report on last summer's bioremediation experiment in the upper Hudson River. The report showed that naturally occurring microorganisms isolated in the research caissons destroyed an average of 50 percent of the PCBs in the upper Hudson in only ten weeks.

In its Phase II Work and Sampling Plan, EPA has now set forth the outline of an ambitious agenda of data collection and analysis. But this is only an outline. This plan cannot be adequately evaluated because it does not contain a clear statement of EPA's goals and objectives nor does it contain sufficient detail about sampling, analytical and interpretation procedures. EPA still has not made public its Phase I Responsiveness Summary, which will largely explain the rationale for the work to be performed in Phase II. There must be at least

30 days for Community Interaction Program participants and the public to review the Responsiveness Summary before the comment period on the Phase II work plan ends.

As EPA begins the complex Phase II process, GE offers the following two suggestions to enhance communication among all participants in the reassessment process. First, consistent with EPA's community interaction program, we believe it is important to conduct a second public information meeting on the Phase II plan for those people unable to attend tonight's meeting. Second, to enhance the exchange of technical information, we ask EPA to begin a series of monthly working meetings for all interested parties to discuss the critical sampling and data interpretation data issues. We are pleased to submit specifics on our second proposal tonight.

We are encouraged that EPA plans to adopt a more realistic method of assessing the potential risks that Hudson River PCBs may pose to human health. The proposed range-of-exposures (or Monte Carlo) method gives weight to all risk factors based on their actual occurrence, as recommended in recent EPA national guidance for the Superfund program. As a result, it is critical that EPA use current information from the Hudson River area, such as fish consumption rates, not studies of saltwater fish consumption from the West Coast. To ensure its accuracy, the range-of-exposures method must also consider every possible factor, including the effect of declining PCB levels in fish and the kinds of fish most commonly consumed. It is important to note that risk estimates of any kind are statistical tools that produce a theoretical number. The actual risk may, of course, be zero.

EPA's decision to conduct congener-specific analysis of PCBs in water and sediment samples is in keeping with the improving scientific understanding of this family of 209 different chemicals. GE discharged two lower chlorinated forms of PCBs from the Hudson Falls and Fort Edward plants. We believe that congener-specific analysis will demonstrate that PCBs found in the upper river do not pose a risk to human health and the environment; that PCBs in the lower river originated from non-GE sources in the lower river, and that PCBs have naturally dechlorinated over time. We believe this congener-specific analysis should also be applied to EPA's Phase II studies of fish. A 1990 analysis of fish data showed that, to a significant degree, lower-Hudson fish accumulated PCBs from these local sources, not from the upper river.

EPA outlines plans in the Phase II report to try to identify lower-river sources of PCBs. We support that effort and encourage the agency to use all of the authority at its disposal to identify and quantify lower-river PCB discharges. A 1977 study listed approximately 220 direct dischargers and 200 indirect dischargers of PCBs in the lower Hudson drainage basin.

EPA proposes to conduct high- and low-resolution coring, a process in which tubes of sediment are extracted from the upper and lower river bottom. EPA's objectives in gathering this information are not clear. This is an experimental process whose application to river

studies is in dispute among leading researchers. Nevertheless, it appears that EPA's conclusions in Phase II on the natural destruction and transport of PCBs may be based on this controversial technique. GE urges EPA to clearly express its goals for this process and outline alternative investigative methods so that the public can evaluate the applicability of this technique to the Hudson River before implementing the coring program.

EPA has proposed to adopt a simplistic model to discern the fate and transport of PCBs in the river. The goal of this analysis must be to determine the kinds and quantities of PCBs that reach the food web through fish. To determine this answer, EPA plans to rely on a correlation analysis -- a questionable statistical technique -- rather than on collecting physical evidence for a detailed model of PCBs in the food web. A model is an essential part of the decision-making process. A faulty or overly simplistic model may well lead to a decision in which the EPA itself has little confidence.

Absent from the sampling and work plan is a discussion of EPA's budget for this evaluation work. GE is pleased with EPA's willingness to study the Hudson River system in detail; in fact, we have urged the agency to collect even more data and develop a more complex fate and transport model. To ensure the credibility of the Phase II Report, we hope EPA will make a public commitment to devote whatever resources are necessary to produce a credible scientific document.

For more information, please contact M. Peter Lanahan, Manager GE State Government Relations, (518) 462-4537.