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July 22, 1994

EPA Region II - Building 209, MS-211
Chief, Response and Prevention Branch
Edison, New Jersey 08837

**RE: CONTINUOUS RELEASE REPORT - EMERGENCY RESPONSE
NOTIFICATION SYSTEM (CR-ERNS) NUMBER 140381
NOTIFICATION OF CHANGE IN INFORMATION**

Dear Sir or Madam:

On October 12, 1992, the General Electric Company ("GE") called the National Response Center ("NRC") to report facts under investigation that may constitute a continuing release of a hazardous substance. The NRC assigned the report CR-ERNS Number 140381. Since that time GE has provided the following written information as part of the report of this continuous release.

1. November 9, 1992: Initial written notification pursuant to 40 C.F.R. § 302.8(e)
2. January 18, 1993: Notification of change in information pursuant to 40 C.F.R. § 302.8(g)
3. February 23, 1993: Update to the initial written report to supply information required by 40 C.F.R. § 302.8(f)(4)(vi)
4. June 10, 1993: Update on the PCB source investigation pursuant to 40 C.F.R. § 302.8(g)(3)
5. December 8, 1993: First annual update required by 40 C.F.R. § 302.8 (f)

On June 22, 1994 GE contacted the NRC hotline to provide notification that seepage of non-aqueous phase liquids, (NAPLs) possibly containing PCBs, had been discovered in fractures in the shale bedrock river bed adjacent to the GE Hudson Falls capacitor manufacturing facility. This seepage was discovered in the river bottom following diversion of the river by Adirondack Hydro during construction of a new dam. While GE reported this information as an update to the existing continuous release report (CR-ERNS Number 140381), the NRC hotline nevertheless assigned it a separate number.

The discovery of this seepage by GE was made as part of a remedial investigation plan submitted to the New York State Department of Environmental Conservation (NYSDEC). The initial response action was to collect the NAPLs with absorbent media and syringes. Follow-up actions have included diversion of river water away from the seepage zone and the collection and treatment of the fluids in a NYSDEC approved treatment system. Since July 8, 1994 GE has been treating waters that collect in the area of concern.

Due to the diffuse nature of the seepage and the method that was necessarily used to collect the contamination (absorbent materials and syringes), GE does not have an accurate estimate of the mass of PCB that seeped out of the fractures. However, it appears that the amount collected by syringes (less than 1 gallon of an oil/water mixture over a few day period) indicates the release was well within the previously reported PCB mass range (0.3 - 32.7 kilograms per day).

Since the seeps were first discovered their activity has greatly diminished. During this period of time GE has continued to monitor the Hudson River immediately below the area of concern and has not seen an increase in PCB levels. In fact, over the last year the PCB levels at this monitoring station have been generally not detected at a method detection limit of 11 part per trillion (ppt). Based on these observations, if seepage from this area was occurring prior to the area of concern being dewatered, then its mass contribution was not detectable in the Hudson River water measurements. If the seeps existed at the magnitude seen after the first few days that the area was exposed, GE believes that such a contribution to the Hudson River would have been detected by the river water monitoring. Based on these observations, GE's current conceptual understanding of the seepage, based on the dynamics of three phase flow (air/water/oil), indicates that the higher amounts of oil present immediately after the area was dewatered was a result of the water in the fractures being replaced by air as the water drained out of the fractures. Under these conditions the oil in the fractures, which may have limited mobility when water was present, began to coalesce and move due to gravitational forces. The result was oil stored in the fractures mobilizing and expressing itself as the observed seepage. As the amount of oil stored in the fractures decreased so did the seepage.

GE's overall investigation and remediation of the area in the vicinity of the Hudson Falls facility has progressed considerably since the initial notification to the NRC on October 12, 1992. Ongoing investigatory efforts are focused on bedrock seeps adjacent to the GE's Hudson Fall facility. GE is working closely with the NYDEC to investigate and remediate the PCB sources in this area. All information generated during the implementation of this project is also supplied on a weekly basis to Mr. Douglas Tomchuk, the EPA Superfund Hudson River Reassessment Remedial Project Manager.

The information provided herein does not indicate that there has been a change in the source or composition of the continuing release initially reported on October 12, 1992, and this report is provided to clarify the telephone call made to the NRC on June 22, 1994. GE's monitoring of PCB levels in the Hudson River continues to indicate that the PCB release meets the definition of "stable in quantity and rate" at 40 C.F.R. § 302.8(b). The information presented in this letter is accurate and current to the best of GE's knowledge and belief.

Should you have any questions concerning this update please do not hesitate to call the undersigned at (518) 458-6618.

Your very truly,

For M. Peter Lanahan

M. Peter Lanahan, Manager
Hudson River Projects

cc: New York State Emergency Response Commission
Case No. 9208046
Washington County Local Emergency Planning Committee
Mr. Douglas Tomchuk, U.S. EPA
Mr. Michael O'Toole, NYSDEC