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JUN 16 1993
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June 10, 1993

Douglas J. Tomchuk
Emergency and Remedial Response Division
U. S. Environmental Protection Agency
26 Federal Plaza, Room 747
New York, NY 10278

RE: TRANSMITTAL OF DATA COLLECTED BY GE - HUDSON RIVER

Dear Mr. Tomchuk:

On May 18, 1993 the General Electric (GE) transmitted to the U. S. Environmental Protection Agency (U.S. EPA) data, in electronic format, that has been collected by GE from the Hudson River. Reports summarizing the data have been completed. These reports also include the raw laboratory data reports as well as related field records.

On June 9, 1993 we were informed by William McCabe to hold sending the reports until you had a place to put the 25 or 50 boxes that contain the data. Please let us know where you like this information sent to. GE again requests that the supplied data and documentation be included in the official Administrative Record of U.S. EPA's on-going RRI/FS. Copies of these data reports have been transmitted to Bill Ports of the New York State Department of Environmental Conservation (NYSDEC).

Please let us know where you would like this information sent to.

Yours truly,

John G. Haggard
Engineering Project Manager

cc: Paul Simon (U.S. EPA)
Bill Ports (NYSDEC)



MAY 24 1993

GE Corporate
Environmental Programs*Paul Simon*

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May 18, 1993

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U.S. Environmental Protection Agency
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New York, NY 10278

RE: TRANSMITTAL OF DATA COLLECTED BY GE - HUDSON RIVER

Dear Mr. Tomchuk:

At the meeting of March 17, 1993, the General Electric Company (GE) summarized PCB data collection efforts undertaken on the Hudson River. This data was collected by GE to understand the significance of PCBs in the various media in the river and was primarily collected due to the concern that the Environmental Protection Agency (EPA) would rely only on the existing data to make a remedy decision in the Superfund Hudson River Reassessment Remedial Investigation/Feasibility Study (RRI/FS). As articulated in comments submitted by GE on various EPA project documents, the existing database was deficient in a number of ways, including the following:

1. The existing data on PCB's in fish did not include detailed information on PCB composition. While the New York Department of Environmental Conservation (NYDEC) has collected a large, useful database on PCB levels in fish in the Hudson River, it includes almost entirely PCB data reported as Aroclors. Given that the PCBs in the sediments have been biologically altered, and no longer are properly quantified as commercial Aroclor mixtures, it is necessary to determine in greater detail the composition of PCBs contained in the fish (i.e., congeners and homologs). This type of data in fish, combined with knowledge of the types of PCB in the various sources (i.e., "old" sediments, remnant deposits, water column - Bakers Falls source, etc.) allows an understanding of which sources of PCBs are impacting fish by use of the source's PCB "fingerprint".

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2. The data on water column PCBs did not include information on the composition of the PCB's. Also, the location and frequency of samplings limited. The historical water column PCB levels have been obtained by the U.S. Geological Survey and the NYDEC. This data has proven useful in determining time trends in PCB loading in the Hudson River. However, the data was limited by the fact it was analyzed by packed column GC/ECD techniques and reported as total PCBs. Given the presence of the biologically altered PCBs in the sediments in the upper Hudson River, the contribution of PCBs from the altered sediments versus those present in the water column prior to entering the Thompson Island Pool, was difficult to determine. In addition, the frequency of monitoring was limited and did not allow a full understanding of temporal changes in PCB levels or composition.
3. The sediment PCB composition was poorly characterized and the PCB levels were last determined approximately 10 years ago. The PCB levels in the sediments were initially determined in the late 1970's for the entire upper Hudson River. In the early 1980's a more detailed PCB sediment study was conducted in a 5 mile portion of the river (Thompson Island Pool). Given the amount of time that had transpired and the fact that limited capillary column GC/ECD data had indicated the sediment composition was altered, there was a need to determine PCB levels and composition as a function of depth in the sediment for the entire river.
4. The existing data is insufficient to characterize the newly identified PCB source (i.e., Bakers Falls source) and to understand its impact on the river system. During water column monitoring conducted by GE, a previously unidentified source of PCB was detected above the remnant deposits. This is now referred to as the Bakers Falls source. Extensive investigations of this have been undertaken by GE to isolate and characterize this source and to determine its impact on the river. GE continues to work closely with the NYDEC on this investigation and will take appropriate action to remedy this source if it is from GE.

To rectify these deficiencies, GE undertook a large data collection process. GE is still in the process of evaluating this new information and has presented to EPA, NYDEC and others a number of the significant findings, including the following:

1. The "old" sediments are supplying ever-decreasing amounts of degraded PCB's to the system -- those with dramatically reduced bioaccumulation potential;
2. The Bakers Falls PCB source is recontaminating the surface sediments with bioavailable, non-degraded PCBs; and
3. The Bakers Falls PCB source is and has been controlling PCB fish levels in the upper Hudson River, not the PCBs from the "old" sediments.

GE will continue to evaluate this significant data and requests that the EPA incorporate this new information into the RRI/FS. It is clear that any consideration of remedial alternatives for the river must include the evaluation of the Bakers Falls source of PCBs. GE requests that during your review that periodic meetings (e.g., monthly) be held with GE (and other interested parties) to discuss the evaluation of this data. To facilitate your evaluation, as previously discussed, the data is being supplied to EPA and NYDEC in a highly usable form. Enclosed is a 3 1/2 inch computer disk (formatted with MS-DOS version 5.1) that contains this data. On the disk you will find a compressed file called GE051893.ZIP. When "unzipped" the following files will be found:

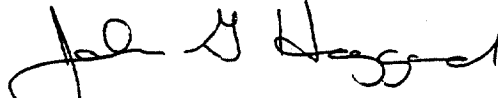
- GE051893.DBF (dBase IV): Various sampling information, total PCB values and homolog distributions.
- CP051893.DBF (dBase IV): 118 peaks from the DB-1 capillary column (e.g., congener data base)
- GE051893.WP (Word Perfect): File structure table
- CP051893.WP (Word Perfect): File structure table

Attachment 1 contains a hard copy of the two file structure tables. Attachment 2 lists the data sets included in the electronic data bases (Note: The hydrographic data is not included in the PCB data bases but is available in separate data files).

In addition to the electronic data, under separate cover within the next 2 weeks you will receive reports that summarize each of the data sets including a description of sample collection and analytical techniques. The appendices to these reports contain all of the associated laboratory analytical results, including quality assurance and quality control data. As mentioned previously, these laboratory reports are available for immediate viewing in Albany. Additionally, validation reports for the many data sets are being prepared and will be submitted in the near future. Due to the volume of the material, in excess of 70 linear feet, you will be contacted prior to shipment in order that you may specify the location to which the data should be delivered. This information will be shipped directly from GE's consultant, O'Brien & Gere Engineers. A listing of the reports is contained in Attachment 2. You will note that a number of the data sets identified in the March 30, 1993 summary are not included on this list. These smaller data sets are currently being compiled and will be submitted in the near future.

GE requests that the supplied data and associated documentation be included in the official Administrative Record of the EPA's on-going Hudson River RRI/FS. If during your review you find any documentation incomplete or have any questions concerning methods by which the data was collected or analyzed, please contact us. GE requests that EPA acknowledge receipt of this information and inform GE when it has been entered into the Administrative Record. If you have any questions, please contact me at (518) 458-6619.

Yours truly,



John G. Haggard
Engineering Project Manager

Attachments

cc: Bill Ports, NYDEC (with attachments)
Frank Bifera, NYDEC
Paul Simon, U.S. EPA
Bill McCabe, U.S. EPA
Bob Montione, NYDOH (with attachments)
Ron Sloan, NYDEC (with attachments)
David Merrill, Gradient Corp. (with attachments)
Gordon Johnson, NY Attorney General's Office
Dean Sommer, NY Attorney General's Office