



**GE Corporate
Environmental Programs**

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July 21, 1997

✓ **Douglas Tomchuk**
NYS DEC
290 Broadway
New York, NY

Re: Comment on the Scenic Hudson Dredging Proposal

Dear Mr. Tomchuk:

Recently, Scenic Hudson, Inc., a lower river special interest group, released a report entitled: Advances in Dredging Sediments: New Technologies and Experiences Relevant to the Hudson River PCBs Site (April 1997). This report purports to summarize the experiences gained to date on dredging for environmental restoration. The report claims that dredging of the Hudson river sediments is feasible and goes on to recommend dredging of the Hudson River. This report clearly does not present an objective review of the state of the technology nor any analysis indicating dredging would have any benefits. It was generated by an organization that has advocated dredging in the Hudson River for decades.

We understand, EPA has not yet begun the feasibility study that will evaluate remedial options and as a result the Scenic Hudson report is premature. However, given the public debate that has ensued as a result of the release of this report we feel it is necessary to respond.

Enclosed find copies of two reports we have sponsored::

- **An Evaluation of the Feasibility of Environmental Dredging in the Upper Hudson River; Including an Evaluation and Critique of Scenic Hudson's Dredging Report (GE corporate Environmental Program, May 1997)**
- **Comments on Advances in Dredging of Contaminated Sediment (Dr. John B. Herbich, Ph.D., P.E., June 23, 1997)**

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The first report was prepared with the assistance of Brad Cushing, P.E., from the consulting firm of Applied Environmental Management and the engineering consulting firm of Blasland, Bouck & Lee. The second report was prepared by the recognized international expert on dredging, Dr. John B. Herbich. A copy of his curriculum vitae is also enclosed.

It is clear from these comments, prepared by experts with real experience in the field of dredging, that the Scenic Hudson's report is superficial, misleading at times and incomplete. Based on the analysis of experiences gained from other relevant sites around the United States where dredging for environmental reasons has occurred, dredging remains an unproven technology for the specific conditions found in the Upper Hudson River. We encourage you and your technical team to carefully scrutinize not only the material that we have submitted but also the report and claims made by Scenic Hudson, Inc.

Please place copies of these reports in the Hudson River Administrative Record. We will be glad to meet with you to explain our comments in more detail.

Very truly yours,

John G. Haggard
Engineering Project Manager
Hudson River Project

JGH/ss

cc: Al D'Bernardo, TAMS
Doug McCabe, EPA