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*Fox
Muszycki
cc: Caspe / Action*

May 28, 1999

Ms. Jeanne Fox
Regional Administrator
U.S. Environmental Protection Agency
Region 2
26 Federal Plaza
New York, NY 10007

*Response due
6/17/99
Direct Reply*

Dear Ms. Fox,

I understand that, at the public meeting following the release of EPA's Model of the Upper Hudson River, your staff was not encouraging about the joint peer review of both the EPA and GE models. I am writing because I believe this to be a very important proposal which deserves to be pursued and accepted.

Both EPA and GE have recently issued reports on the models which their consultants have developed to predict the effects of future action or no action with regard to the Hudson River Superfund site. The public interest lies in assuring that the best diagnostic tool available is used in making decisions as to what actions, if any, are appropriate for the Upper Hudson River. The key to assuring that the public interest is served lies in the peer review process. Properly conducted, peer review will go along way toward developing public confidence in the model used as the basis for remedial analysis. Let me explain.

Effective and informed peer review would start with a charge focused on the central questions EPA has posed in its reassessment and ask the peer reviewers to evaluate the ability of each model to provide accurate and reliable answers to the central questions.

There are other benchmarks of sound peer review which will build public confidence: expertise, impartiality, access to relevant information, and openness to the whole spectrum of views and analysis. The review must be conducted by experts in the subject matter involved - true peers. For instance, the panel which reviewed the

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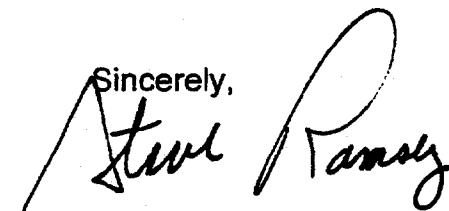
Low Resolution Coring Report would not have the expertise to review the modeling work. Impartiality requires that there not be closed meetings between the peer reviewers and any interested party - GE, EPA, environmental or citizen groups. Access to relevant information is essential to obtain fully informed views and requires that the peer reviewers be able to ask for data or analysis from any party, both before and at the public review meeting. Openness requires that all interested parties have a full opportunity to express their views to the peer reviewers; citizens and environmental groups as well as EPA and GE should be heard from with sufficient time for a serious presentation.

This process needs adequate time for the reviewers to digest all the relevant information in advance of the meeting. The public meeting of the panel may take more than the two days that peer review meetings have taken in the past. The value in assuring that the best modeling work is used in decision-making and the value of public confidence gained by making that evaluation on the basis of full knowledge and impartiality will be immense and will more than repay the additional time and effort.

EPA has an opportunity to make an impressive example of sound decision-making through the use of knowledgeable and impartial peer review of the two models which have been developed. The public interest lies in making this opportunity a model of responsible government.

I look forward to hearing from you on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Ramsey". The signature is fluid and cursive, with a large, sweeping "S" at the beginning and a stylized "Ramsey" at the end.

Stephen D. Ramsey