



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

SEP 30 1999

Certified Mail
Return Receipt Requested

Stephen D. Ramsey
Vice President - Corporate Environmental Programs
General Electric Company
3135 Easton Turnpike
Fairfield, CT 06431

Re: Hudson River PCBs Superfund Site

Dear Mr. Ramsey:

This is in response to your June 2, 1999 correspondence to Regional Administrator Jeanne Fox, which reiterates General Electric Company's ("GE's") request for a side-by-side peer review of the U.S. Environmental Protection Agency's ("EPA's") and GE's models for the Hudson River PCBs site. According to your letter, given that GE is willing to cover the expense associated with the peer review of GE's model, "there should be no other legitimate objection to a joint peer review."

As EPA has explained to GE on a number of occasions, including in my June 10, 1999 letter to you and at the May 18, 1999 Joint Liaison Group Meeting in Albany, New York, the peer review of EPA's Baseline Modeling Report will not include a comparison of EPA's and GE's models, because such a comparison is beyond the scope and purpose of the peer review. Again, consistent with EPA's Science Policy Council Peer Review Handbook, the purpose of the peer review is to have independent experts review EPA's Reassessment science to ensure that science underlying the Agency's ultimate decision is technically adequate, competently performed, properly documented, and satisfies established quality requirements. Irrespective of the additional cost associated with reviewing GE's model, it is unnecessary for the peer review panel to compare EPA's and GE's models in order to achieve the purposes of the peer review for the site.

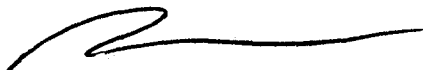
As EPA has stated publicly since release of the Baseline Modeling Report in May 1999, the Agency will consider GE's model as public comment on the Baseline Modeling Report. EPA will respond to all significant public comments in its Responsiveness Summary for the Baseline Modeling Report, which will be released in January 2000. The peer reviewers for the Baseline Modeling Report, who will convene in March 2000, will be provided with copies of the Responsiveness Summary for the Baseline Modeling Report, which will contain GE's modeling

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reports (May 1999, revised July 1999) as well as EPA's response to GE's model. While this is not a side-by-side peer review, the peer reviewers will have GE's model and EPA's response to it available to them for the peer review.

Please call me at (212) 637-4390 if you wish to discuss this matter further.

Sincerely yours,

A handwritten signature in black ink, appearing to be 'R. Caspe', with a long horizontal stroke extending to the right.

Richard L. Caspe, Director
Emergency and Remedial Response Division