



70243

GE Corporate
Environmental Programs

John G. Haggard
Engineering Project Manager
Hudson River

General Electric Company
1 Computer Drive South, Albany, NY 12205
518 458-6619 Dial Comm: 8*920-9000
Fax: 518 458-9247

February 5, 1992

Douglas J. Tomchuk
Remedial Project Manager
U.S. Environmental Protection Agency
Emergency & Remedial Response Division
26 Federal Plaza
New York, New York 10278

Re: Hudson River Reassessment-Phase 2A Data Collection

Dear Mr. Tomchuk:

In a letter submitted to you by the General Electric Company (GE) dated September 24, 1991, a number of technical and implementation concerns were given concerning the Phase 2A collection effort being planned by the U.S. Environmental Protection Agency (EPA) for the Hudson River Reassessment Project. These concerns were reiterated to you at meetings held in the EPA offices on October 2 and November 21. We have yet to receive a response to these comments. I would like to again express our concerns with the Phase 2A data collection effort and recommend that the field activities be further evaluated prior to additional implementation.

It is our understanding the EPA decided to split the data collection program into a Phase 2A and Phase 2B effort so that data collection would not miss the 1991 field season. Due to these alleged time constraints EPA decided not to allow comment on the Phase 2A data collection plan. Since EPA missed the 1991 field collection season and we now have months before data can be efficiently and safely collected in the field, GE requests that EPA at least allow a short comment period (2 weeks?) on Phase 2A data collection program prior to field implementation. GE also requests that EPA supply a Quality Assurance Project Plan (QAPP) and sampling and analysis plan that is consistent with EPA Superfund implementation guidance for comment prior to additional field activities.

The field geophysical program (side-scan sonar) was initiated in December 1991. This effort was apparently terminated due to ice on the river and only a portion of the data planned for collection was obtained. As stated in the September 24 comment letter the Phase 2A sampling plan did not contain a QAPP or an analysis of data quality objectives, both of which are required by the EPA Superfund implementation guidance. It is our understanding these documents have still not been prepared. This deviation from established EPA guidance is more than just a short

322660

circuiting of required procedures. There is considerable uncertainty on whether the method will supply data of use to the project. At a recent EPA public meeting it was stated that the costs for the field geophysical program were about \$10,000 per day.

GE encourages the EPA to follow its own procedures and develop explicit data quality objectives for this extremely expensive research technique prior to continued implementation of the data collection. Currently, it is not clear whether as stated in meetings that you hope to use this technique for mapping the PCB distributions in the Thompson Island Pool or whether you plan on using the technique for something related to the feasibility study. Clearly, the definition of project objectives are necessary when evaluating a data collection technique to determine if the technique will achieve the defined goal(s). Without these objectives and goals the use of the field geophysical technique appears more like an unfocused research effort as opposed to a well defined Superfund data collection effort. GE requests that EPA issue a proper data collection plan (with data quality objectives) and QAPP prior to any additional field efforts.

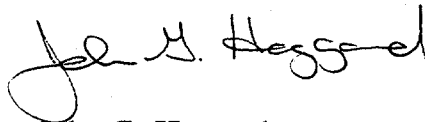
Additionally, we request that the data collected to date be made available to GE and other parties interested in the Hudson River Reassessment project prior to additional field implementation to allow evaluation of whether the technique has been able to meet the yet to be established data quality objectives. We also request a response to the large number of comments we submitted on this and the other data collection techniques in our September 24 comments prior to implementation of additional field investigations.

With respect to the actual data collection efforts GE again requests that EPA provide some notice to interested parties of EPA sponsored field activities so observation of the field data collection efforts can be made. We were not notified of the recent data collection efforts until they were complete. We understand this was not the intent and would hope to be provided notice of future activities. Please let me know if this presents any problems.

Page 3

Your timely response to these comments and recommendations would be appreciated. Please place a copy of this letter and the GE letters (and associated attachments) of September 24, 1991 into the Hudson River Administrative Record. If you have any questions or require clarification of these comments I can be reached at (518) 458-6619

Yours truly,

A handwritten signature in dark ink, appearing to read "John G. Haggard". The signature is fluid and cursive, with a large initial "J" and "H".

John G. Haggard
Engineering Project Manager

cc: William McCabe, U.S. EPA
Bob Runyan, U.S. EPA (New Jersey)
Paul Simon, U.S. EPA

322662