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Corporate Environmental Programs  
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March 3, 1993

Mr. William Muszynski  
Acting Regional Administrator  
United States Environmental Protection Agency  
26 Federal Plaza  
New York, NY 10278

Dear Bill:

The purpose of this letter is to ask EPA to modify the scope of work of its Hudson River RRI/FS. As you are aware, data have shown increasing concentrations of PCBs in the Hudson River water column at certain times in recent months from a source above the remnant deposits and above the sediments, and this source has affected levels of PCBs in upper river fish. In an effort to ascertain the exact location of the point or points from which these PCBs are entering the river and what causes their mobilization, GE has informed the State of New York that GE is undertaking two investigations. One, which is part of an on-going investigation of the GE/Hudson Falls plant site, is an evaluation of potential subsurface pathways from the site to the river. The other is an investigation in the raceway on the eastern side of the river and in the abandoned Allen Mills structure. These investigations are being done in coordination with the State of New York. GE will, of course, make all test results promptly available to EPA.

There is a strong interdependence between the upriver GE investigative work and the RRI/FS, which has focused upon sediments in the river and the desirability of dredging certain of those sediments. If indeed PCBs are continuing to enter the water column from above the remnant deposits and sediments, then this must be taken into account by EPA in making any decision to reduce the flux of PCBs in the river and uptake by fish. It would be futile and lacking in scientific credibility to dredge portions of the river only to allow other PCBs from an upriver source to settle in and re-contaminate those areas. EPA's own national sediment strategy emphasizes control of sources to eliminate the possibility of recontamination. The National Contingency Plan also requires source control. It specifically requires EPA to conduct appropriate field

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investigations to assess the extent to which the "source [of the contaminant] can be adequately identified and characterized" (40 C.F.R. §300.430(d)(2)(iv)).

As a result of this interdependence, GE respectfully requests that EPA modify the scope of work of its RRI/FS to include the investigative work that GE will be doing, which is outlined in this letter. Specifically, EPA should take into account the data being collected to determine the effects of the Bakers Falls source as compared to the effects of the sediment. In addition, EPA should consider what should be done about the Bakers Falls source and what impact that will have on any other remedy being considered for the river. This modification in the RRI/FS is compelled by the NCP as well as by scientific realities concerning this site.

Very truly yours,



M. Peter Lanahan

MPL:jgf