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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

SEP 0 3 1996

Mr. Melvin Schweiger
Manager - Hudson River Project
General Electric Company
1 Computer Drive South
Albany, New York 12205

Re: Hudson River PCBs Site - Additional Data Collections with Respect to the Thompson Island Pool "Anomaly"

Dear Mr. Schweiger:

This is in response to your letter of August 15, 1996, in which the General Electric Company (GE) suggests a joint effort to conduct additional investigations to further characterize what GE refers to as the Thompson Island Pool (TIP) "anomaly."

EPA does not necessarily agree with all of GE's conclusions regarding the source of the PCB load to the water column across the TIP. EPA does not believe that a source of highly concentrated, unaltered Aroclor 1242 exists on the sediment surface of the TIP and believes that the increased load and shift in congener pattern across the pool are consistent with simple sediment-water exchange processes with the measured sediment conditions. The main difference in our positions concerns the appropriateness and accuracy of GE's subtraction calculation involving pre- and post-September 1991 PCB fluxes at the Thompson Island Dam. As a result, EPA is able to explain the large TIP load gain as the result of the extensive inventory of dechlorinated sediments. At the same time, GE draws the conclusion that the sediment source responsible for the large increase across the TIP is not dechlorinated. Further details of EPA's analyses will be available to GE when the Data Evaluation and Interpretation Report is released to the public--scheduled for January 1997.

I want to make it clear that besides routine river monitoring, EPA does not believe that additional sampling is essential to make a sound final decision for the contaminated sediments in the upper Hudson River. As such, EPA will not participate with GE in a joint program to investigate the TIP "anomaly", and does not intend to conduct a critical review of GE's "Hudson River PCB DNAPL Transport and Water Column Monitoring Study."

As an aside, I would also note that even if one were to wish to further examine the TIP "anomaly" issue that you have raised, the kind of investigative program that GE is contemplating does not appear likely to adequately address that issue.

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Obviously, an important aspect of any Hudson River monitoring is the continuation of existing water-column sampling. It is essential that GE continues the monitoring at the Fenimore Bridge, Rogers Island and the Thompson Island Dam stations on a regular basis. The canoe carry location is not essential and can be dropped from the sampling program. The monitoring should continue to be analyzed by a capillary column PCB methodology, as it is necessary to understand the inputs of sources from the different reaches of the river. Given certain limitations in GE's current analytical technique, EPA recommends that GE add specific quantification for BZ#1, BZ#4, BZ#8 and BZ#10.

If you have any questions, please feel free to contact me at (212) 637-3956.

Sincerely yours,

Douglas J. Tomchuk, Project Manager
Hudson River PCBs Site

cc: Bill Ports, NYSDEC
John Haggard, GE