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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
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NEW YORK, NY 10007-1866

OCT 11 1996

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

RE: GE Investigations of Thompson Island Pool "Anomaly"

Dear Mr. Schweiger:

This is in response to your letter of September 9, 1996 in which you requested that EPA elaborate on its comments regarding GE's investigations of the Thompson Island Pool "anomaly." I understand that the sampling plan under discussion has actually now been implemented, but there are still several issues that I would like to clarify.

In his September 3, 1996 letter to you, Douglas Tomchuk stated that EPA does not believe that additional sampling is essential to make a sound final decision for the PCB-contaminated sediments in the upper Hudson River. This is based on EPA's preliminary interpretation of the data, which can explain the increased PCB load and shift in congener patterns across the Thompson Island Pool (TIP) as a result of the sediments within the pool. EPA offered to hold the second meeting (the August 15, 1996 meeting) with GE in order to discuss the difference in interpretations between GE and EPA, as the EPA representatives most familiar with that data were not available to attend the first meeting. While EPA could not provide the details of its preliminary interpretations until they have undergone agency review, the conceptual differences in interpretation were discussed at that meeting.

In your letter, you also expressed concern that Mr. Tomchuk's letter noted that the investigations currently planned by GE would not adequately address the TIP "anomaly" issue as raised by GE. This is based on his cursory review of the "Hudson River PCB DNAPL Transport and Water Column Monitoring Study" and discussions of that sampling plan with GE staff. To state his concerns simply, the GE program that is currently planned, even if fully successful in achieving its objectives, would not provide conclusive evidence that DNAPL transport of PCB within the bedload actually exists (one cannot sample separate phases of PCBs in the bedload directly). At best, it could only point to further investigations that might be attempted in the future.

I look forward to our meeting on October 21, 1996, in order to discuss these matters further, as well as any other issues regarding the Reassessment. Please contact Mr. Tomchuk at (212) 637-3956 if you have any questions prior to our meeting.

Sincerely yours,



Richard L. Caspe, Director
Emergency and Remedial Response Division

cc: Bill Ports, NYSDEC