



70256

**GE Corporate  
Environmental Programs**

**John G. Haggard**  
Engineering Project Manager  
Hudson River Project

General Electric Company  
1 Computer Drive South  
Albany, NY 12205  
(518) 458-6619  
Fax: (518) 458-1014  
Email: [John.Haggard@corporate.ge.com](mailto:John.Haggard@corporate.ge.com)  
Pager: (518) 484-3177

February 10, 1998

Douglas Tomchuk  
US EPA  
Emergency and Remedial Response Division  
290 Broadway - 20<sup>th</sup> floor  
New York, NY 10007-1866

Walter Demick  
NYDEC  
Central Remedial Proj.  
50 Wolf Road  
Albany, NY 12233

Re: Corrections to the U.S. GS Water Column Data

Gentlemen:

Enclosed is a memorandum prepared by Jim Rhea of Quantitative Environmental Analysis, LLC (QEA-formerly of HydroQual) related to an analytical bias in the PCB measurements performed on Hudson River water samples collected by the U.S. Geological Survey (U.S. GS) in the late-1980's and early-1990's. As you may recall, these data provide information on the conditions in the river prior to the PCB releases from the Allen Mill and will allow, through PCB fate and transport modeling, the determination of the long term rate of natural recovery in sediment, water and fish. The preliminary analysis, which is based on a small subset of the samples, suggests that the PCB results are underestimated by between 6% and 44% for water samples collected from stations within or downstream of the Thompson Island Pool (TIP). As a result of this, the uncorrected U.S. GS data should not be used for model calibration.

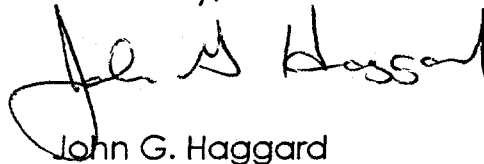
Given the importance of these data, the potential magnitude of the bias, and the variability of the bias (i.e., there is not a simple correction factor that fits all the data), GE proposes that GE, NYDEC and the EPA work collaboratively to correct this valuable data set so it can be used for model calibration. To this end, if the NYDEC and EPA concur with the approach taken to correct the data as outlined in the enclosed memorandum, GE will have QEA proceed to evaluate all the laboratory records we currently have

322717

in house from the U.S. GS sampling results from Stillwater, Schuylerville and Waterford. We expect it would take approximately 8-10 weeks to generate a summary report for agency review.

Please let me know if the agencies concur with the approach or if you would like a full copy of the laboratory records that we were able to obtain from the US GS. They are rather voluminous and will not send them unless you so desire.

Yours Truly;

A handwritten signature in black ink, appearing to read "John G. Haggard". The signature is fluid and cursive, with the first name "John" being the most prominent.

John G. Haggard

enclosure

cc: William Ports, NYDEC  
Anders Carlson, NYDOH  
Vic Bierman, LimnoTech  
Al D'Bernardo, TAMs  
Douglas Fisher, U.S. EPA