



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
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February 22, 2000

VIA FAX and MAIL

Mr. James N. Ludlam, P.E., Project Manager
New York State Department of Environmental Conservation
50 Wolf Road
Albany, N.Y. 12233-7010

Dear Mr. Ludlam:

The U.S. Environmental Protection Agency (EPA) has reviewed the New York State Department of Environmental Conservation (NYSDEC's) November 1999 Proposed Remedial Action Plan (PRAP) for the General Electric Hudson Falls Plant Site. As you are aware, EPA is conducting a Reassessment Remedial Investigation and Feasibility Study (Reassessment) of the PCB-contaminated sediments in the Upper Hudson River.

A finding of EPA's Revised Baseline Modeling Report is that PCB (Tri+) loads from upstream of the model boundary at Fort Edward control the long-term responses of concentrations in the water column and surface sediments, and accordingly, body burdens in fish. In light of this finding and other Reassessment work, EPA recommends that NYSDEC select remedial alternatives at the Hudson Falls Plant Site that maximize the reduction of PCB loading to the river.

I understand that NYSDEC has water sample data showing concentrations in the Hudson River adjacent to the Hudson Falls Plant Site and that those concentrations are in excess of the New York State Water Quality Standards, 6 NYCRR Parts 701 and 702. Bullet 3, in the right-hand column of page 6 of the PRAP cites to this. However, surface water quality standards are not referenced in Table 1 which lists Standards, Criteria, and Guidance (SCG) values. We feel that this should be included. Let me go on to say that the background section of NYSDEC's Record of Decision (ROD) for the Hudson Falls Plant Site should state clearly that the release of PCBs from the Hudson Falls Plant Site has violated New York State Water Quality Standards.

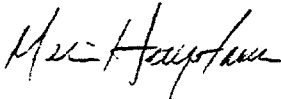
As outlined in the PRAP, NYSDEC's preferred remedy for Operable Units 2A and 2B (overburden soils and associated groundwater) is Alternative 7A, which includes excavation and on-site treatment of surface soils exceeding 1 ppm of PCBs and subsurface soils exceeding 10 ppm, continued operation of the groundwater containment, recovery, and treatment systems, and NAPL recovery system. For Operable Units 2A and 2B, this alternative should reduce PCB loading to the river and EPA supports NYSDEC's selection of Alternative 7A as the remedial alternative. The Compliance with New York State Standards, Criteria, and Guidance discussion for Alternative 7A and Alternative 9A does not say that these two alternatives will arrest the "violations of the surface water standards". The less aggressive alternatives state that they will

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"result in continued violations of the surface water standards for PCBs in the Hudson River in the vicinity of the site". The ROD should state that NYSDEC expects that implementation of this remedy, along with the other remedial work at the Hudson Falls Plant Site, will contribute toward achieving New York State Water Quality Standards.

We appreciate the opportunity to comment on this PRAP and support all efforts to remediate PCBs at the General Electric Hudson Falls Plant Site.

Sincerely,

A handwritten signature in dark ink, appearing to read "Melvin Hauptman". The signature is written in a cursive, flowing style.

Melvin Hauptman, P.E., Leader
Sediment Projects/Caribbean Team
Emergency and Remedial Response Division