



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
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70282

AUG 10 2000

Stephen D. Ramsey
Vice President
Corporate Environmental Programs
General Electric Company
3135 Easton Turnpike
Fairfield, CT 06431

Re: Hudson River PCBs Superfund Site

Dear Mr. Ramsey:

This is in response to your August 2, 2000 correspondence, in which you request a meeting with EPA to discuss five technical issues identified in your letter relating to the Hudson River PCBs site. In response to your request, on August 10 a meeting between myself, my deputy William McCabe, and John Haggard (GE) took place which I believe was successful in enhancing the dialogue between EPA and GE. Additional meetings are in the process of being established.

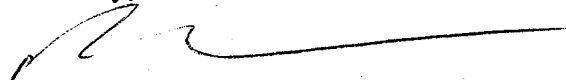
In your letter, you ask how EPA intends to respond to the recent peer reviews of the human health and ecological risk assessments. As you know, the peer review panel for the Human Health Risk Assessment (HHRA) found the HHRA acceptable, with revisions required. The revisions, in the opinion of the panel, would strengthen the document in terms of making the risk characterization more clear and transparent. However, the panel agreed with EPA's basic finding that people eating fish in the Upper Hudson River are at risk above EPA's levels of concern. EPA is considering the panel's recommendations for the HHRA, and believes that those suggested changes that are necessary and within the constraints of CERCLA and current EPA guidance can be incorporated into the Reassessment.

With regard to the Ecological Risk Assessment (ERA), four panel members found the ERA acceptable with major revisions required, while two panel members found the ERA unacceptable. EPA continues to evaluate the panel's recommendations, and will make a number of changes to the ERA that will provide a more robust assessment. EPA currently expects to issue an updated HHRA and ERA at the same time it issues its responses to the HHRA and ERA peer review comments.

Finally, I would like to respond to your offer to let you know if there are other issues about which EPA would like information from GE. I am requesting detailed information about GE's proposed source control efforts at Hudson Falls. Consistent with its belief in source control, GE recently proposed, among other things, construction of a "french drain" system to intercept and collect PCBs in bedrock under the Hudson Falls facility before it reaches the River. While EPA does not agree with GE's belief that ongoing PCB releases from the Hudson Falls facility are the major source of PCBs to Hudson River fish, we do believe that the ongoing releases of PCBs from the Hudson Falls facility, together with PCBs in sediments, continue to compromise the health of the River. To that end, EPA is particularly interested in the specifics of GE's proposals to reduce or eliminate the ongoing releases of PCBs from the Hudson Falls facility, and we request that GE provide EPA with copies of GE's geotechnical, data analyses, engineering and design documents for the proposed additional source control efforts at Hudson Falls.

If you wish to further discuss EPA's request for GE's engineering documents relating to the Hudson Falls source control, please call me at (212) 637-4390.

Sincerely,



Richard L. Caspe, Director
Emergency and Remedial Response Division

cc: Ben W. Heineman, Jr., GE
John Haggard, GE