

DEC 16 1991

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

Dear Mr. Ramsey:

This is in response to your letter of October 24, 1991 which transmitted the overview of General Electric's (GE's) comments regarding the Phase 1 Report for the Hudson River PCBs site. EPA is preparing a responsiveness summary to address the comments received on this document, and therefore I will not respond to specific comments in this letter.

I will make a few observations in passing, however. First, many of your comments appear to be focused on the issue of whether or not dredging of the PCB-contaminated river sediments would be appropriate. Much of that discussion -- like an analysis of other possible remedial alternatives for the site -- is actually premature in the context of the comment period on the Phase 1 Report and would be more applicable to Phase 3 of the Reassessment RI/FS, that is, the Feasibility Study.

Regarding the issue of the administrative record, I understand that compilation of an administrative record file has been initiated by EPA, and that a GE representative reviewed the contents of the file as of October 23, 1991. Additional documents are being added to the administrative record file on an ongoing basis, and this will continue to occur as the Reassessment RI/FS proceeds. It should be noted that even prior to the commencement of the formal compilation of the administrative record, GE and the public were provided with numerous opportunities to provide significant comment on the project through, for example, the Community Interaction Program established for the site. The issuance of the Phase 1 Report for public comment for a period of 60 days has in itself provided all interested parties with an opportunity to comment on EPA's assumptions and findings, long before EPA makes a decision regarding the appropriate remedial alternative.

SYMBOL ---->	ENYCSII	ENYCSII	ORC	ENYCBII	NY/CP	ERRD	OEP	DRA
SURNAME ---->	TOMCHUK	HAUPTMAN	SIMON	PETERSEN	McCABE	CALLAHAN	MARSHALL	MUSZYNSKI
DATE ---->	11/13/91 DTT	11/24/91 DTT	11/25/91	11/27				
SYMBOL ---->	RA							
SURNAME ---->	SIDAMON-ERISTOFF							
DATE ---->								

We welcome GE's input into the Reassessment process, and will consider your comments on the Phase 1 Report.

Sincerely,

/s/

Constantine Sidamon-Eristoff
Regional Administrator

cc: Thomas Jorling, Commissioner
New York State Department of Environmental Conservation

bcc: CCO
Paul Simon, ORC
Ann Rychlenski, OEP



John H. Claussen
Manager - Hudson Project Team

Corporate Environmental Programs
General Electric Company
3135 Easton Turnpike, Fairfield, CT 06431
203 373-2714, Fax: 203 373-3342

October 24, 1991

Mr. Douglas Tomchuk
Hudson River PCBs Site Project Manager
U.S. Environmental Protection Agency
Region II - Room 747
26 Federal Plaza
New York, New York 10278

Dear Mr. Tomchuk:

Enclosed are GE's comments on EPA's Phase 1 Report for its Hudson River Reassessment. Please place these comments in the Agency's administrative record for the Hudson River site.

I recognize that our comments are voluminous and in some instances highly technical. I therefore recommend that GE be given the opportunity to give you and your consultants a verbal presentation that will capture the essence of our points. I look forward to your response to that proposal.

In the meantime, if you or your consultants have any questions about our comments or require additional information, please call me or John Haggard.

Sincerely,



John H. Claussen

JHC:jt
Enclosure
cc: A. DiBernardo