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JUN 24 1994

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Mr. M. Peter Lanahan  
Manager, Hudson River Project  
General Electric Company  
One Computer Drive South  
Albany, New York 12205

Re: Hudson River PCBs Site - Reassessment RI/FS

Dear Mr. Lanahan:

This is in response to your letter of April 25, 1994 concerning the Hudson River PCBs site. Your letter deals with General Electric's (GE's) opportunities to comment on the work being conducted by EPA on the Reassessment.

Most of the issues in your letter were addressed in my April 29, 1994 letter (which was mailed prior to receipt of your April 25th letter) and thus need not be addressed again here. I would like to briefly respond, though, to your statement regarding public input on the modeling issues.

EPA held a meeting for GE on March 23, 1994 regarding the modeling effort, a day before the Scientific and Technical Committee (STC) meeting on the same topic. The purpose of the earlier meeting was to receive GE's comments and have technical dialogue regarding the modeling. I feel it is important to be explicit on this point to correct any impression that GE has not been given such an opportunity. Indeed, our meeting with GE regarding the modeling issues is just one example of the numerous EPA/NYSDEC/GE technical meetings that EPA has convened at GE's request during the course of the Reassessment. Contrary to what you seem to suggest in your letter, GE has certainly had a meaningful opportunity to have a technical dialogue with EPA.

I also note that EPA has provided several memoranda prepared by the modeling subcontractors which outline the scope of the modeling effort to be conducted. In addition, liaison group members were invited to observe the STC meeting on this topic. While a formal public comment period has not been held specifically on modeling, the model calibrations and assumptions to be used in the application runs of the model will be presented for comment in the Phase 2 modeling report.

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Finally, I thank you and the other members of the GE staff for your courtesy and the informative tour of the GE Hudson Falls facility on June 2, 1994. I look forward to our continuing technical discussions on matters of mutual interest during the remainder of the Reassessment process.

Sincerely yours,

Kathleen C. Callahan, Director  
Emergency and Remedial Response Division

cc: Michael O'Toole, Jr., Director  
Division of Hazardous Waste Remediation  
New York State Department of Environmental Conservation

bcc: Paul Simon, ORC  
✓ Doug Fischer, ORC  
Ann Rychlenski, EPD