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**GE Corporate
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Douglas J. Tomchuk
Emergency and Remedial Response Division
U. S. Environmental Protection Agency
26 Federal Plaza, Room 747
New York, NY 10278

RE: HUDSON RIVER REASSESSMENT RI/FS FEASIBILITY STUDY

Dear Mr. Tomchuk:

As a result of the request made by General Electric (GE) under the Freedom of Information Act, the draft Phase 3 Feasibility Study (FS) Statement of Work was obtained. While it is unclear whether the U. S. EPA is following this or a similar plan for the Hudson River Reassessment RI/FS, it has proven to be a thought provoking document.

Regardless of the details of the approach, it is clear the FS represents an important process in the Hudson River Reassessment where all of the data evaluations are brought together and culminate in a thorough evaluation of what, if anything, should be done with the contaminated sediment and if necessary, how best to proceed with remediation. It is during this process where a meaningful interaction program with interested parties is critical and interaction opportunities should increase. Unfortunately, it appears just the opposite situation is occurring. GE's current understanding is that for Feasibility Study (Phase 3), U. S. EPA is only planning to release the final FS report and the proposed plan for formal comment, after which a Record of Decision (ROD) will be issued. This opportunity for involvement occurs after all the FS evaluations have been completed, which will probably not occur for over a year.

Given the importance of the FS process in the U. S. EPA reassessment and U. S. EPA's avowed commitment to an exemplary program for facilitating involvement by interested parties, GE has the following requests to increase opportunities for involvement. These changes should have little or no impact on EPA's budget or schedule:

A.) Overview Meeting: At the Fall 1993 HROC meeting the status of the FS was reviewed and it was learned that EPA was in the process of identifying and screening technologies and examples of the effort were handed out. Presumably, that effort has continued and is much further along. It is suggested that U. S. EPA present a status report on the FS and provide the results of the effort to date. A discussion of the future

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effort would also be useful (See next comments). GE requests that a meeting be scheduled at EPA's earliest convenience, hopefully in September or October.

B.) Release of Interim Reports/Documents: As described in the draft FS Statement of Work and U. S. EPA guidance, U. S. EPA's contractor will be performing a number of tasks in sequence that build upon one another. Given this approach, it will be easy for U. S. EPA to release, at least for information, if not for comment, a number of interim deliverables on the FS that will allow input and interaction in a meaningful way prior to the release of the final FS. Specifically, GE requests the U. S. EPA provide the following information or analysis when it is available to the U. S. EPA.

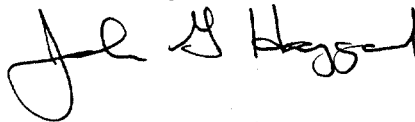
- Applicable or Relevant and Appropriate Requirements (ARARs): Preliminary ARAR's where identified in the Phase I report. When New York State provides a list of state ARARs and to be considered requirements (TBCs) to U. S. EPA, these should be released for review and discussion.
- Remedial Action Objectives: Presumably, upon completion of the risk assessments, U. S. EPA will develop Remedial Action Objectives that will be crucial to the completion of the FS. Given the importance of these, it is requested that these be made available for review and comment at the earliest possible stage.
- Identification and Screening of Applicable Technologies and Process Options: This can be completed in two parts, the first would identify and then perform a quick screen of technologies and process potentially applicable. The second step would be a more methodological evaluation and would result in a final list of technologies and process options to be carried into the next stage. This evaluation could also be made available in table form.
- Development and Screening of Remedial Alternatives: At this point, the various technologies and processes are combined to address the Remedial Action Objectives and then a streamlined evaluation occurs so a final list of alternatives is developed. This is a critical point in the project and GE requests that EPA clearly identify the selected and screen alternatives prior to proceeding with the final analysis.
- Detailed Analysis of Remedial Alternatives: It is requested that U. S. EPA use this as a way to pull together a full FS document for public information without an indicated bias to a given remedy. After a relatively short period of time EPA would issue the proposed plan for formal public comment.

C.) STATUS MEETINGS: It is requested that EPA hold status meetings on the FS (and hopefully the whole project) when the remedial action objectives are defined, the process options and technologies have been identified and screened; the initial development and screening alternatives is complete, and the detailed analysis of alternatives is complete. This will only require that EPA provide updates approximately once a quarter over the next year.

Given the magnitude of this project, these requests are not unreasonable. The suggestions and requests made are certainly not the only method to have an acceptable level of involvement of interested parties and GE is interested in discussing any reasonable option to increase involvement opportunities.

Please let me know if additional opportunities for involvement in Phase 3 of the reassessment will be offered.

Yours truly,

A handwritten signature in black ink, appearing to read "John G. Haggard", written in a cursive style.

John G. Haggard
Engineering Project Manager

cc: Bill Ports, NYSDEC