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VIA OVERNIGHT MAIL

May 29, 1996

Douglas J. Tomchuk
Hudson River Remedial Project Manager
290 Broadway
20th Floor
New York, New York 10007-1866

RE: COMMENTS ON THE U.S. EPA HUDSON RIVER DATABASE

With your letter of April 18, 1996 you transmitted to GE copies of the CD-ROM containing the data compiled by the U.S. EPA for the Hudson River Reassessment RI/FS (RRI/FS) project. You requested comments on the database by May 29, 1996.

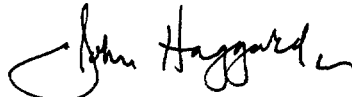
The database clearly represents a significant effort to compile analytical data from the Hudson River. The database appears to capture the majority of the data that GE is aware of. However, a number of large data sets have not been included. Attachment 1 is a listing of data sets that should be included in the database since they are relevant to the Hudson River RRI/FS. The major omission in the database is for information from the lower river. During the March 17, 1993 presentation by GE to the EPA project team and my subsequent letter to you dated March 30, 1993 we identified the data sets generated by GE on the Hudson river, including those GE data sets listed in Attachment 1. This data should have been provided to you in electronic or hard copy form. However, if you find you do not have this data in your files we will be glad to make it available to you

In addition to adding the important historical data sets to the database, GE encourages EPA to update and distribute the database as new information becomes available. As you are aware, GE is collecting water samples on a weekly basis for PCB analysis. Additionally, the New York DEC obtains PCB levels in fish on a yearly basis in the entire Hudson river. This fish and water data collected over the next few years will be crucial to understanding the recovery rate in the river that will occur in the future as a result of the declining impact of the elevated loading from the Allen Mill in 1991 and 1992 as well as from the further anticipated reductions in PCB loading from ground water in the vicinity of Baker Falls. GE believes that this data will be critical to the calibration and validation of the EPA PCB model of the Hudson River.

Even if the EPA chooses not to update the database with the information described in the Attachment 1 and the data yet to be collected. GE requests that all of these data be considered in the Hudson River RRI/FS and be placed into the site Administrative Record as it is made available to the agency.

If you have any questions or disagree with the recommendations please let me know.

Yours truly,



John G. Haggard

attachment

cc: Walter Demick, NYDEC
Anders Carlson, NYDOH
Ron Sloan, NYDEC
Paul Simon, U. S. EPA

ATTACHMENT
DATA SETS MISSING FROM THE U.S.EPA HUDSON RIVER DATABASE
MAY 23, 1995

LOCATION/ PROGRAM	ORIGIN	MEDIA	PARAMETER	CURRENT FORM
Lower River, New York Harbor, Long Island Sound	GE/Harza 1988-1991	sediment, biota	PCB, pest, lipid,	dBase IV files
TIP TSS Survey	GE/OBG 1991	water	TSS	report, dBase IV files
Polygon (3)	GE/OBG 1990	sediment	PCB	dBase IV
EPA Lower River Helicopter Survey	EPA, 1976	sediment	PCB	EPA report
EPA Lower River Survey	EPA, 1981	sediment	PCB	EPA report
NYU Lower River Biota	NYU, pre- 1982	biota	PCB	NYU Report