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**GE Corporate
Environmental Programs**

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Mr. Richard Caspe, Director
Emergency & Remedial Response Division
U.S. EPA, Region 2
290 Broadway
New York, N.Y. 10007-1866

1998 OCT 29 PM 1:00
DIRECTOR'S OFFICE

USEPA REGION II
EMERGENCY RESPONSE DIVISION

Dear Mr. Caspe:

In our August 31 comments on EPA's Low-Resolution Coring Report and our September 15 presentation to you and your staff, GE raised serious questions about the validity of the analysis conducted by EPA's contractor and the conclusions the Agency reported to the public.

To date, EPA has not responded to our comments or presentation.

Yet when asked by members of the EPA Steering Committee Monday, Oct. 19, about GE's criticism that the EPA report improperly compared apples to oranges, Project Manager Doug Tomchuk said: "GE is saying that, but it's not true."

Doug told the Steering Committee that EPA might have erred because "EPA did not qualify the uncertainty" associated with the conclusion that 40% of the PCBs in the "hot spots" had been swept downstream, that the number could fall "between 5 and 75%," but that the number "is probably around 40%." But he claimed that EPA's contractor did, in fact, compare apples to apples -- measuring PCBs with three or more chlorines in 1984 against PCBs with three or more chlorines in 1994.

This is not true. There is no indication in the low-resolution coring report that EPA performed the comparison in the way it said it should be performed.

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Doug also said that EPA has not committed to impaneling an independent peer review group to review the LRCR prior to making a some decision on the Upper Hudson. I hope we can agree that the Agency, the public and the scientific integrity of the Reassessment are best served by independent, external peer review of this report taking place as soon as possible.

Please include this letter in the administrative record.

Sincerely,



Melvin B. Schweiger

MBS/alt

cc: Douglas Fischer, Esq.
Melvin Hauptman
William McCabe
Douglas Tomchuk