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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

OCT 21 1999

John G. Haggard, Manager  
Hudson River PCB Projects  
General Electric Company  
320 Great Oaks Office Park, Suite 323  
Albany, NY 12203

Re: Hudson River PCBs Reassessment  
Human Health and Ecological Risk Assessments

Dear Mr. Haggard:

On September 2, 1999, I sent you, by email and hard copy, the supplemental information regarding the Monte Carlo Analysis portion of the Human Health Risk Assessment for the Upper Hudson River that you requested in your August 31, 1999 letter regarding the risk assessments. I also notified you that the U.S. Environmental Protection Agency (EPA) had granted your request for a two-week extension, through September 17, 1999, for General Electric Company (GE) to submit comments on the supplemental information as part of the public comment period.

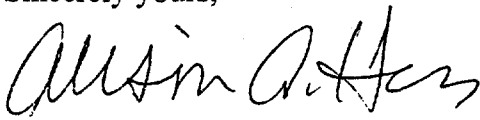
In your September 17, 1999 letter, sent the day your comments on the supplemental information were due, you stated that GE had "begun the task of evaluating the materials sent" but that EPA had not provided information on how it dealt with angler survey responses reported as question marks. In a September 21, 1999 email, I directed your attention to p. 42 of the Human Health Risk Assessment for the Upper Hudson River, which provides that information.

In your August 31 letter, you stated that the simultaneous 30-day public comment periods on the Human Health Risk Assessment for the Upper Hudson River and the Ecological Risk Assessment compromised GE's ability to provide complete comments. While we understand that you and other GE personnel may have had additional work to provide comments on the two reports, GE's comments were prepared by two different consultants, with specialties in human health and ecological risk assessments, respectively. In addition, we note that a GE representative for public relations attended one of our public availability sessions on the reports, but GE did not send any technical representatives to ask questions or discuss issues with EPA's technical teams for the Human Health and Ecological Risk Assessments. Based on the more than 200 pages of comments that GE submitted on the reports, it appears that GE was able to give both reports a thorough review. Moreover, as you know, under CERCLA and the NCP, EPA is required to provide a single 30-day public comment period on the documents that comprise a remedial investigation/feasibility study and proposed plan. In contrast, for the Hudson River PCBs Reassessment, EPA has held public comment periods on each of the technical documents released so far, including the Phase 1 Report, the Database Report, the Preliminary Modeling

Calibration Report, the Data Evaluation and Interpretation Report, the Low Resolution Sediment Coring Report, the Baseline Modeling Report, the Human Health Risk Assessment Scope of Work, the Ecological Risk Assessment Scope of Work, the Human Health Risk Assessment for the Upper Hudson River, the Ecological Risk Assessment, and the Feasibility Study Scope of Work. EPA believes that GE's ability to comment has been substantially enhanced by these additional opportunities for public comment as the Reassessment progresses.

To date, EPA has not received any comments from GE on the supplemental information on the Monte Carlo Analysis, which are now more than 30 days overdue. Please let me know if and when you intend to submit comments on this supplemental information. I can be reached at (212) 637-3959.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Alison A. Hess".

Alison A. Hess, C.P.G.  
Project Manager  
Hudson River PCBs Site



John G. Haggard, Manager  
Hudson River Program

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**VIA FACSIMILE**

September 17, 1999

Alison A. Hess  
Project Manager  
U.S. Environmental Protection Agency  
290 Broadway, 20<sup>th</sup> Floor  
New York, NY 10007-1866

**RE: HUDSON RIVER HUMAN HEALTH RISK ASSESSMENT – REQUEST FOR  
SUPPLEMENTAL INFORMATION**

Dear Ms. Hess:

This letter is in response to Mr. McCabe's letter to the General Electric Company (GE) dated September 2, 1999 in which you provided supplemental information on the Human Health Risk Assessment (HHRA) for the Upper Hudson River. We requested the additional information because it was either unclear in the original document or missing entirely, preventing a meaningful review of the assessment.

GE has begun the task of evaluating the materials sent. Difficulties in opening the SAS files have prevented us from making a complete determination of the contents of the files at this time. As a result, we can not confirm that all of the requested information has been sent.

However, at least one request has not been met. GE requested a "clear description of how the Connelly et al. (1992) data were analyzed to derive the distribution of consumption rates". While additional information provided in the package is helpful, it is still unclear how the actual distribution was developed. For example, it is not clear how EPA dealt with the responses where some or all of the fish meals at specific locations were reported as question marks.

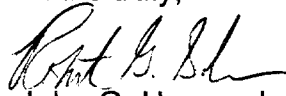
As stated in previous correspondence, given the significance of this document and the amount of time EPA required to prepare it, the comment period was unreasonably short. Therefore, we will continue to supplement our comments to address areas where we could not complete our analysis due to the lack of time, particularly those related to the additional information described above.

Alison Hess  
September 17, 1999  
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If you have any questions on these comments, please let me know.

Yours truly,

  
for John G. Haggard

cc: Richard Caspe, U.S. EPA  
William McCabe, U.S. EPA  
Douglas Tomchuk, U.S. EPA

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