



70323

John G. Haggard, Manager
Hudson River Program

General Electric Company
320 Great Oaks Office Park, Ste. 323
Albany, NY 12203
Fax: (518) 862-2731
Telephone: (518) 862-2739
Dial Comm: 8* 232-2739
E-Mail: John.Haggard@corporate.ge.com
Pager: 518-484-3177

VIA FACSIMILE AND U.S. MAIL

January 7, 2000

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

**RE: REQUEST FOR ADDITIONAL INFORMATION
MID-HUDSON RIVER HUMAN HEALTH RISK ASSESSMENT / LOWER
HUDSON RIVER FUTURE ECOLOGICAL RISK ASSESSMENT**

Dear Ms. Hess:

The General Electric Company (GE) has received copies of the two Hudson River risk assessment addenda dated December 29, 1999. We received these documents one day after your press release was issued to the public and media on January 4, 2000. The comment period is set to close on January 28, 2000. As a result, the comment period is less than 30 days as envisioned in the Hudson River Community Relations Plan.

Both risk assessment documents depend on the results of the model developed by Dr. Kevin Farley and the new HUDTOX and FISHRAND modeling completed by EPA's contractors. The original Farley modeling report issued in March 1999 has not been peer reviewed and your risk assessment documents indicate that in fact, the Farley model has been modified since its original release date. In the case of the new EPA modeling, this information has not even been released to the public. It is impossible for the public to provide a thorough review of these risk assessment documents without detailed information on the new modeling work and defeats the purpose of the public comment process.

Therefore, we request that the comment period be extended to 30 days after the receipt of the revised Baseline Modeling Report, anticipated later this month. We also request that EPA provide the details of its contractors review of the modeling work done by Dr. Farley and provide for a comment period on Dr. Farley's work. This is important since Dr. Farley's model is a key element of EPA's risk assessment for the lower Hudson River. The comment period should be suspended until the modeling is provided to allow a full 30-day review of all information used to develop the risk assessment addenda.

10.6266

Alison Hess
January 7, 2000
Page 2

Because the comment period is now three weeks away, a timely response to our request would be appreciated.

Yours truly,


John G. Haggard

cc: Richard Caspe, U.S. EPA
William McCabe, U.S. EPA
Douglas Fischer, U.S. EPA (ORC)
Marion Olsen, U.S. EPA
Erin Crotty, NYDEC
Walter Demick, NYDEC
William Ports, NYDEC
Nancy Kim, NYDOH
Anders Carlson, NYDOH
Bob Montione, NYDOH