

JAN 20 2000

John Haggard
General Electric Company
Hudson River PCBs Site
320 Great Oaks Office, Suite 323
Albany, NY 12203

Re: Human Health Risk Assessment for the Mid-Hudson River
Ecological Risk Assessment for Future Risks in the Lower Hudson River

Dear Mr. Haggard:

This is in response to your January 7, 2000 letter regarding the Human Health Risk Assessment for the Mid-Hudson River and the Ecological Risk Assessment for Future Risks in the Lower Hudson River (the "Addendum Risk Assessments"), in which you requested additional information and an extension of time for General Electric Company (GE) to comment on the Addendum Risk Assessments.

Specifically, you requested that the U.S. Environmental Protection Agency (EPA) extend the public comment period, which closes on January 28, 2000, for "30 days after the receipt of" the Revised Baseline Modeling Report, which is due to be released by the end of January. You also requested "details of [EPA's] contractors review of the modeling work done by Dr. Farley" (the Farley model) and that EPA establish a public comment period for the report by Farley et al. (1999), entitled "An Integrated Model of Organic Chemical Fate and Bioaccumulation in the Hudson River Estuary," which EPA used in conducting the Addendum Risk Assessments.

You stated that you received the Addendum Risk Assessments on January 5, 2000. To ensure that GE has a full 30 days to comment, EPA is hereby granting an extension of time for GE to submit comments on the Addendum Risk Assessments through close of business on February 4, 2000. We are not granting an extension of 30 days from GE's receipt of the Revised Baseline Modeling Report because we believe that the information presented in the Addendum Risk Assessments is sufficient to allow the public to provide meaningful comments on the Addendum Risk Assessments, and that the extension you requested would cause unnecessary delay to the Reassessment. Moreover, we note that GE, as well as other members of the public, will have an additional opportunity to comment on the Reassessment reports following EPA's release of the Feasibility Study and Proposed Plan in December 2000.

A detailed discussion of EPA's use of the Farley model is presented in the Ecological Risk Assessment for Future Risks in the Lower Hudson River. Your attention is directed to Section 3.1, Quantification of PCB Fate and Transport: Modeling Exposure Concentrations, of that report.

As part of its comprehensive Community Interaction Program, EPA has solicited public comment on each of the Reassessment documents as they have been issued. However, the Farley et al. (1999) report was prepared for the Hudson River Foundation, not EPA. Therefore, EPA is not soliciting public comment on it. Nevertheless, EPA will make copies of the Farley et al. (1999) report available to the public by placing copies of it in the Information Repositories and the Administrative Record file established for this site.

If you have any questions regarding this matter, please contact me at (212) 637-3959.

Sincerely yours,

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

bcc: D. Fischer, ORC ✓
A. Rychlenski, CD