

**To:** Jackson, Ryan[jackson.ryan@epa.gov]  
**From:** Gilli, Cheryl (GE Corporate)  
**Sent:** Wed 5/24/2017 9:59:03 PM  
**Subject:** Letter to Administrator Pruitt regarding Hudson River 5YR  
Pruitt letter - signed re Hudson River May 24, 2017.pdf

Ryan,

I hope you are doing well. I wanted to share with you the attached letter I sent to Administrator Pruitt today regarding the Five Year Review on the Hudson River.

Thank you,

A handwritten signature, likely of Cheryl Gilli, consisting of a stylized 'C' followed by a horizontal line.



Global Operations

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May 24, 2017

Scott Pruitt, Administrator  
United States Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Mail Code: 1101A  
Washington, DC 20460

Dear Administrator Pruitt:

We understand the Environmental Protection Agency (EPA) is close to completing its second five-year review report assessing the performance of the enormously successful Hudson River dredging program. Given your expression of interest in significant Superfund matters, I wanted to share our perspective on the demonstrated success of the remedy.

General Electric has been a steadfast partner with EPA, New York State, and local communities during the 15 year implementation of the remedy and is confident that the scientific data will demonstrate the efforts to clean up the Hudson to be among the most successful remedies in the history of CERCLA. The selection and implementation of the remedy was a landmark triumph of collaboration between EPA, New York State, local communities, and GE. EPA selected the remedy, the New York State Department of Environmental Conservation (NYSDEC) concurred, and GE implemented it under close supervision of both EPA, New York, and local communities. It has worked, is working, and will continue to work to improve the quality of River for all.

The Agency has stated that the project has been "enormously successful," "a tremendous accomplishment," and that "there is no reason to question the effectiveness of the cleanup." (Capital New York, 5/5/14; EPA Press Release, 5/7/15; *Saratogian*, 10/2/15). All parties recognized in selecting the remedy that use advisories would be phased out in the years after the completion of the dredging, and those predictions are being realized. In the lower Hudson from Manhattan to Albany, advisories allow the consumption of fish today and in the upper Hudson north of Albany the river has been declared safe for swimming, boating and even use as a source of treated drinking water. Regarding fish consumption in the upper Hudson, EPA predicted consumption advisories could be significantly reduced about 15 years after dredging and the data confirms this; for example, yellow perch in the majority of the Upper Hudson are now below 0.4 ppm, a trend that could allow for a relaxation of the consumption advisory for this species in the next few years.

As EPA finalizes the second five-year review, it is presented with a single question: whether the selected remedy is functioning as intended. We are proud of the fact that since the completion of the \$1.7 billion remedy, there has been uniform consensus that the parties went above and beyond in removing even more PCBs and much sooner than planned. For example, when EPA found more

PCBs in some areas of the river than anticipated, we responded in real time and as a result some 310,000 pounds of PCBs were removed, more than twice EPA's original estimate. Further, the first group of data collected since the completion of the dredging project in 2015 corroborates the types of environmental improvements that EPA expected: PCB levels in water have declined significantly since the completion of dredging, and PCB concentrations in fish collected in 2016 show overall declines as well.

Looking forward, GE will continue to vigorously support partnership with EPA and others to monitor post-dredging river conditions as EPA continues to assess the results of the project. And as required by the federal Superfund law, EPA will issue progress reports on the river's recovery every five years, and in each of those, EPA will continue to assess whether remedy is performing as expected.

I'd be happy to answer any questions you have, and look forward to working with you and your Administration.

Sincerely,

A handwritten signature in black ink, appearing to read "A R K L", written over a horizontal line.

Ann R. Klee  
Vice President - Environment, Health & Safety