GE Hudson Falls

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November 3, 1975

Dr. Don Wilkins
General Electric Co.
Corporate Research and Development
Schenectady, N.Y.

Dear Don:

I would like to document the following points with respect to the meeting held October 29, 1975 at the EPA National Water Quality Lab (NWQL), Duluth, Minnesota among Dr. Gil Veith (NWQL), Dr. Garry Glass (Dr. Veith's supervisor, NWQL), Dr. Woody Ligon (GE), yourself and myself. As you are aware, the meeting was held to discuss analyses performed by Dr. Veith on biota from the Hudson River above and below General Electric discharges. These analyses were performed on a "technical assistance" basis at the request of the EPA Region II lab.

Overall, I feel Dr. Veith's methodology is sound and would give accurate quantitative information regarding PCB levels in biota.

1. Dr. Veith was clearly unsure about what areas he was at liberty to discuss, in light of the letter to Ed Simons (GE) from Dr. Labrizzi (?) (Region II EPA) stating that the discussion was to cover only the raw data from Dr. Veith's analyses, not the report in which the data appeared.

2. The question regarding the duplicated chromatograms, Figure 17 of the EPA report, was cleared up by Dr. Veith giving you a copy of the correct chromatogram of the bass sample. This chromatogram did show apparent high PCB levels, based on the need for a 50X dilution of the extract prior to gas chromatography. The duplication of the figure apparently occurred during compilation of the report.

3. I have reviewed Dr. Veith's procedures as published in Proc. 14th Conf. Great Lakes Res. 1971, pp. 157-169. I am confident the procedures will give reliable measurements of PCB levels in biota.

4. Dr. Veith's method of quantitation, i.e., summation of peak heights of selected interference-free peaks and comparison to identical peaks in PCB standards is acceptable. His inability to recall exactly which peaks he used to quantitate the Aroclor 1242 in the Hudson River samples does not affect the fact that PCBs are present at about the levels reported.

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5. Dr. Veith's procedure of using the Aroclor most closely resembling the detected residue as a standard for quantitation is also acceptable. However, I do feel that he should have stressed in his report that the residues were quantitated using a given Aroclor as a standard and not identified as that Aroclor.

6. Dr. Veith clearly felt that the limited number of analyses (7) which he performed were preliminary investigations and that the actual relevancy of his data to the New York state case is questionable. He stated that the fairly high levels found only pointed to the need for further investigations, which apparently have been carried out by the state labs.

7. Dr. Veith's use of perchlorination as a confirmatory technique probably is sound. He obviously is aware of the limitations of the method and the possible problems in its use. The fact that he has determined the linear range of his gas chromatograph for decachlorobiphenyl (0.02 to 0.15 ng) indicates thorough evaluation of the method.

I feel the above are the important points covered in our meeting with Dr. Veith. I would appreciate receiving copies of the data supplied to you by Dr. Veith.

Yours truly,

Robert G. Kaley, II

Robert G. Kaley, II Ph.D.

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