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December 23, 2016

Gary J. Klawinski
Director, Hudson River Field Office and EPA Project Coordinator
U.S. Environmental Protection Agency, Region 2
187 Wolf Road, Suite 303
Albany, New York 12205

(Two paper copies (one unbound) and one flash drive)

**Re: Hudson River PCBs Superfund Site
Remedial Action Consent Decree (Civil Action No.1:05 CV-1270)
Submission of Remedial Action Completion Report**

Dear Mr. Klawinski:

Enclosed is the Remedial Action Completion Report for the remedy specified by the U.S. Environmental Protection Agency (EPA) in its 2002 Record of Decision (ROD) for the Upper Hudson River sediments.

The Upper Hudson environmental dredging project was unprecedented in scale and complexity. The project was years in the making, requiring a world-class team of engineers and scientists to plan, design, and complete. Coordination with EPA, which approved and supervised all of our work, as well as with New York State, occurred on a daily basis. Dredging was conducted around the clock, six days a week, six months a year, for six years. GE appreciates the cooperation and patience of local residents and community leaders who dealt with quality-of-life issues such as noise and lighting as the work was performed. As a result of the project, the majority of the PCBs in the Upper Hudson were removed, and dredged areas were restored with a massive habitat restoration program. The project was successfully implemented and executed with a high standard of care for the workers, local communities, and the environment.

With the dredging activities completed, GE worked with EPA to decommission and restore the sediment processing facility that GE leased in Fort Edward, along with all shoreline properties used to support the project. All leases and other access agreements have been terminated, and the properties have been returned to the owners. Much of the infrastructure at the processing facility was left behind, with EPA's approval, to help Fort Edward and the property owners position the site for future economic development opportunities.

With the dredging portion of the project successfully completed, GE and EPA are now collecting the long-term monitoring data on PCB levels in fish, sediments, and water to document the rate of decline in PCB levels. Early monitoring results are encouraging. Data collected and analyzed in 2016 show PCB levels in water have declined from pre-dredging levels. EPA has stated it will take five to eight additional years to collect the data needed to fully evaluate the river's rate of recovery. These long-term monitoring activities, however, are not part of the Remedial Action (RA) phase of the work, as defined in the Consent Decree (CD) for this Site.

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Based on the above, and pursuant to Paragraph 57.a of the CD, GE has determined that the RA described in the 2002 ROD and defined in the CD has been completed in accordance with the CD. All required RA activities in the river have been completed, and all land-based activities have likewise been completed.

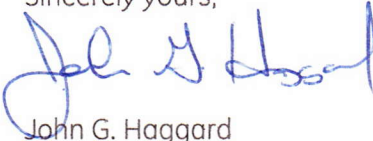
Further, GE considers that the inspections that were held on November 10, 2016 for the project support areas and on November 30, 2016 for the sediment processing facility (with a follow-up on December 16, 2016), as described in my letter to you of December 16, 2016, satisfied the requirement of Paragraph 57.a for an RA Completion Pre-Final Inspection, given that no additional inspections have been required.

Accordingly, GE is herewith submitting the Remedial Action Completion Report pursuant to Paragraph 57.b of the CD, and GE respectfully requests that EPA issue a Certification of Completion of the RA pursuant to and in accordance with Paragraphs 57.d and 57.e of the CD.

Each paper copy of the text of this report is accompanied by a flash drive that contains the numerous and extensive appendices.

Please let us know if you have any questions or comments.

Sincerely yours,



John G. Haggard
GE Project Coordinator

Enclosure

cc:

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Chief, New York/Caribbean Superfund Branch
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Attn: Hudson River PCBs Superfund Site Attorney
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Re: DJ #90-11-2-529
(Cover letter only)

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