AUG 1 5 1997

Bruce Venner, Chief
Bureau of Federal Case Management
New Jersey Department of Environmental Protection
P. O. Box 028
Trenton, NJ 08625

Re: L.E. Carpenter Superfund Site, Wharton Borough, Morris County, New Jersey

Dear Mr. Venner:

In a letter dated December 5, 1996 the New Jersey Department of Environmental Protection (NJDEP) indicated that it was considering revising the remedy outlined in the April 18, 1994 Record of Decision (ROD) for the L. E. Carpenter Superfund site, Wharton, New Jersey. The letter stated that this decision was based on new site data that indicated that the volume of contaminated soils had increased substantially from the amount estimated in the ROD. This increase is purportedly the result of historical mining activities not attributable to L. E. Carpenter operations. On April 9, 1997 the United States Environmental Protection Agency (EPA) responded with a letter that confirmed EPA's commitment to help the NJDEP decide whether the remedy should be revised or not. To help EPA with making a decision on this issue, EPA's letter requested a copy of all new site related data acquired by the NJDEP since the 1994 ROD.

EPA has completed its review of the data provided by the NJDEP and conducted a site visit on June 17, 1997. This letter hereby provides EPA's comments on additional work proposed in Section 4.0, Conclusions and Recommendations of the Second Quarter Progress Report for August 1996, submitted by Roy F. Weston Inc. In addition, several recommendations are outlined, which when implemented, will provide the information necessary to make a determinination on whether or not the ROD should be revised.

EPA is committed to assist the NJDEP make a determination with respect to whether the remedy should be revised or not, however, you should know that the site data that has been provided is not sufficient and additional characterization information needs to be provided in order to support any revision of the 1994 ROD. For example, the NJDEP proposes a soil cap of two feet to cover areas that exceed the remedial criteria for lead of 600 parts per million (ppm), however, the August 1996 report states that "lead concentrations in excess of the remedial goal of 600 mg/kg are prevalent throughout the fill material . . . no horizontal or vertical gradient or trend can be established. Further, the boundary of the extent of lead concentrations which exceed 600 mg/kg cannot be determined." In order to evaluate any potential

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proposal, the extent of lead contamination should be accurately delineated and submitted for review along with a comprehensive sample location map. The proposal should develop an analysis of alternatives that compares the risk, volume of contaminated soils and cost estimate that were outlined in the 1994 ROD for the original remedy to the new information obtained during subsequent investigations. In addition, the potential effects of flooding from the Rockaway River, adjacent to the site, should be included in the evaluation considering the composition of any proposed cap material. Based on EPA's experience it appears that the proposed change involves more than a simple change to the ROD. In making a case to change the ROD, the Potentially Responsible Party should refer to EPA's Guidance on Preparing Superfund Decision Documents, Preliminary Draft (Directive 93553-02).

EPA strongly recommends that additional soil samples be obtained along the drainage ditch adjacent to the northeast end of the site which may act as a contaminant source to the river. Only four samples have been obtained from the vicinity of the ditch, and of these, only two samples were analyzed for lead. One sample from the north end of the ditch indicated lead at a concentration of 500 ppm, which is slightly below the remedial action level of 600 ppm. Therefore, EPA recommends that several additional samples be collected to confirm whether or not parts of the ditch are above the remedial action level. In the same area, monitoring wells 22 through 25 indicated that groundwater is contaminated with lead above the Maximum Contaminant Level (MCL). It is not clear what remedial action, if any, will be proposed to address this area. In addition, local health officials should be notified of the exceedences of the MCL.

With respect to bis(2-ethylhexly)phthalate (DEHP) contamination, EPA's comments on the remainder of section 4.0 are as follows: Hot Spot 1 has not been fully delineated with respect to DEHP. EPA recommends that two additional well points be installed south of the line formed by borings B-1 and B-3, as the analytical results for location B-3 indicated DEHP at a concentration well above the 100 ppm excavation criteria for vadose zone soils outlined in the ROD. EPA concurs with NJDEP's comments on the remainder of the Section 4.0.

Should you have any questions or comments on this letter please do not hesitate to give me a call at (212) 637-4418, or have your staff call Stephen Cipot at (212) 637-4411.

Sincerely yours,

Carole Petersen, Chief
New Jersey Remediation Branch

Attachment

bcc: Stephen Cipot, SNRJS
Del Karlen, ORC
Sharri Stevens, BTAG