NUS CORPORATION
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8506-14-18 ORIGINAL (Red)

our 25th year

SEMS DocID 2332281

February 25, 1986
R-585-8-5-22
68-01-6699

Mr. Harold Byer
U.S. Environmental Protection Agency
841 Chestnut Building
Ninth and Chestnut Streets
Philadelphia, PA 19107

Subject: Peer Review Comments
TDD No. F3-8506-14
Pigeon Point Landfill
New Castle, Delaware

Dear Mr. Byer:

In response to peer review comments by Laura Boornazian for the subject site, the following changes have been made:

- All grammatical and typographical corrections have been made.
- The general description of the facility has been expanded to include all pertinent items.
- In paragraph 2 of the Aquifer of Concern, page numbers for reference no. 5 have been added.
- Reference no. 7 has been added to the Groundwater Rationale section to help support the last sentence in paragraph 3. This statement was included to explain what may be construed as anomalous data (i.e., no contaminants found in the monitoring wells closest to the Delaware).
- The distance has been included, as requested, in reference no. 9.
- In reference no. 16, it has been clarified who was responsible for the sampling.
- A more legible copy of reference no. 17 has been added.
- The results of the sampling of well no. 29 have been added to reference no. 19.

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- Arsenic has been shown in ug/l in reference no. 19.
- Regarding waste quantity, the DSWA has been contacted (see reference no. 22).
- Regarding groundwater use, even though Artesian has a connection with Wilmington Suburban, if Artesian's wells were taken out of service, their demand could not be met. Reference no. 26 has been added to document this. No scoring change has been made.
- ICI well no. 11 has been used as the closest well. Appropriate references have been added to document this.
- Irrigation within 3 miles has been researched and the results of this are evident in the report.
- In the facility slope section, the fact that the elevations are surface elevations has been clarified.
- Reference no. 7 has been added to the name of the nearest surface water "facility surrounded" and "facility in surface water" sections.
- For the terrain slope, reference no. 19 (map) has been added.
- The physical state of the wastes was evaluated under surface waters.
- Regarding surface water containment, a clarification has been made in the text and additional references have been added supporting the original premise. FIT III would like to point out that, although "they apply a daily cover, have a dike around the site, and leachate is no longer permitted to flow into the Delaware," the ranking of the surface water route is based upon a worst case situation and present conditions do not necessarily have any bearing on the score.
- Reference to the Christina River has been deleted from the text.
- Reference no. 7 has been added to document tidal influence.
- Coastal wetlands have been addressed.

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- The freshwater wetlands calculations have been clarified.
- The distance to a critical habitat has been researched and rescored.
- Regarding the air route, reference no. 10 has been added, which explains what the wet well is.
- Reference no. 12 has been used for Fire and Explosion.
- For direct contact, present site conditions have been researched, resulting in the rescoring of this section.
- All appropriate changes have been made in the scoresheets.

Contrary to the peer review comments, the following changes have not been made:

- For groundwater rationale, line 4 does indeed imply that the contaminants have migrated into the Potomac as that is exactly what the analytical data indicate.
- No changes have been made in evaluating toxicity/persistence. All of the compounds cited were detected in both the leachate and monitoring wells. In addition, it is known that containment is the same throughout the facility; therefore, what is present in the leachate is accurately indicative of what was disposed at the site.
- Regarding the slope of the terrain, whether well no. 29A is contaminated is irrelevant. This point was used as it is near the edge of the landfill and its elevation is known.

If you have any further questions, please contact me.

Respectfully submitted,

"non responsive based on revised scope"

[redacted]

Senior Staff Scientist

Reviewed by and Approved by,

non responsive based on revised scope

[redacted]

Manager, FIT III

"non responsive based on revised scope"

[redacted]