STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES
& ENVIRONMENTAL CONTROL
DIVISION OF WASTE AND HAZARDOUS SUBSTANCES
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SITE INVESTIGATION &
RESTORATION SECTION

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October 22, 2018

Ms. Debra Rossi, Remedial Project Manager
DE, VA, WV Remedial Branch (3HS23)
EPA Region 3
1650 Arch Street
Philadelphia, PA 19103

RE: DNREC Comment Letter – Pre-Design Investigation (PDI) Work Plan dated August 2018 and Remedial Design (RD) Work Plan dated September 2018
Delaware Sand & Gravel Landfill Superfund Site (DE-0017)
New Castle, Delaware

Dear Ms. Rossi:

The Department of Natural Resources and Environmental Control - Site Investigation and Restoration Section (DNREC-SIRS) appreciates the opportunity to review the above-referenced documents and has the following comments and recommendations:

- For consistency – especially with regards to PFAS sampling – the work plans and SAP should be updated with the groundwater sampling procedures that were discussed at the Army Creek Landfill Site meeting on September 20, 2018, summarized by email dated Oct. 1, 2018. In addition, DNREC would like to have the PFAS results in the EQuIS EDD format, if possible.

  Please note that DNREC has a new PFAS policy for surface water and groundwater effective July 2018. PFOS and PFOA were added to the state list of hazardous substances following the EPA's adoption of a Health Advisory Level of 70 parts per trillion for each contaminant alone or as a combined concentration. This value is now used as the screening level for determining if further evaluation leading to risk assessment needs to be conducted. The policy is available at: **DWHS PFAS Policy**

- The extent of impacted soil and groundwater in the Columbia Aquifer along the northern DDA slurry wall was identified as one of the additional uncertainties considered in the development of the CSM and completion of the FS, as noted in the work plans. It does not appear that this area was fully addressed in the SAP. Additional soil and groundwater

sampling may be needed in the Columbia Aquifer outside of the northern DDA slurry wall and partition area.

- In the future, it should be determined if Army Creek is a gaining or losing stream, as discussed during the Army Creek Landfill Site meeting on September 20, 2018.

Thank you for the opportunity to review the PDI and RD work plans for the Delaware Sand & Gravel Landfill Site. Please let us know if you should have any questions or concerns.

Sincerely,

Christina Wirtz, PG
Site Investigation and Restoration Section

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