From:	Schindler, Jason
To:	Conetta, Benny; Ferreira, Steve; Haklar, James; "Anthony Findley"; Mark D. Fisher (mfisher@elminc.com); Ansari, Ramin; Kirby, Lisa; Ostapczuk, Eric; Michael DiNinno; Venkat Puranapanda (Venkat.puranapanda@chubb.com)
Cc:	Peachey, Bryan; Devorak, Coleen; Sontag, John
Subject:	Hatco Quarterly Progress Report 59
Date:	Tuesday, June 30, 2020 2:36:37 PM
Attachments:	2020-06-30 Weston EPA-Progress Rpt 59.pdf

All

Attached please find a copy of the Quarterly Progress Report for remediation activities at the Hatco site. Feel free to contact me if you have any questions.

Thanks,

Jason

Jason Schindler
Principal Project Manager
Weston Solutions, Inc.
205 Campus Drive
Edison, NJ 08837
Tel: 732-417-5804
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VIA FEDEX

June 30, 2020

Mr. Ben Conetta, Chief
Corrective Action Section
Hazardous Waste Programs Branch
U.S. EPA Region 2
290 Broadway, 25th Floor
New York, New York 10007-1866

Mr. John M. Mitch, Clerk
Woodbridge Township
1 Main Street
Woodbridge, NJ 07095

Re: Hatco Site
Fords, NJ
Program Interest Number G000003943

Dear Mr. Conetta and Mr. Mitch:

Weston Solutions, Inc. (Weston) is forwarding Progress Report Number 59, which covers the activities associated with the Hatco Site from March 1 through May 31, 2020. The progress report is being submitted in accordance with the requirements of Weston's May 25, 2005 Administrative Consent Order and March 30, 2005 USEPA approval letter. If you have any questions, please do not hesitate to contact me at (732) 417-5804.

Very truly yours,
WESTON SOLUTIONS, INC.

Jason Schindler
Principal Project Manager

cc: S. Ferreira, (USEPA)
A. Findley (NJDEP)
M. Fisher – LSRP (ELM)
R. Ansari, L. Kirby, E. Ostapczuk (Hatco/LANXESS)
M. DiNinno (MCUA)
V. Puranapanda (CHUBB)

ADMINISTRATIVE CONSENT ORDER
PROGRESS REPORT

1. Progress Report Number: 59

2. Site Location: Hatco Site
   1020 King Georges Post Road
   Fords, NJ 08863

3. Signatories: Weston Solutions, Inc.
   ACE American Insurance Company
   New Jersey Department of Environmental Protection

4. Reporting Period: March 1 through May 31, 2020

5. Specific Requirements Initiated and Completed During Reporting Period:

   5.1 Weston submitted Progress Report Number 58 on March 31, 2020.

   5.2 Weston provided monthly progress updates by email to the United States Environmental Protection Agency (USEPA) on May 4 and June 8, 2020.

6. Specific Requirements Previously Initiated Which are Continuing:

   6.1 Weston continued light non-aqueous phase liquid (LNAPL) recovery operations. Weston conducted recovery operations at the site using automated skimmer pumps and manual bailers. Total recovery through the end of this reporting period:
   - 10,417 gallons of LNAPL recovered using skimmer pumps and bailers since March 2011;
   - 3,200 gallons recovered and shipped offsite in liquid phase during the Southeast Leg remediation; and
   - 25,000 gallons estimated in LNAPL-saturated soils shipped for offsite disposal during the Southeast Leg remediation.

   6.2 Monthly progress meetings with the Licensed Site Remediation Professional (LSRP).

   6.3 Evaluation of properties adjacent to the Channel D/AOC 25 area, south of Riverside Drive, has identified several other likely sources of contamination to AOC 25. Weston is working with the property owners to evaluate these conditions. Weston prepared a field sampling plan (FSP) and quality assurance project plan (QAPP) addendum to address data gaps identified in the northern portion of Channel D/AOC 25. A copy was provided to EPA and DEP on March 18. The FSP/QAPP has been finalized and Weston is currently finalizing the access agreement with the property owner. Sampling is tentatively planned for August.

   6.4 Weston is working to complete the site-wide cap design and to finalize plans for the field sampling program that is needed to determine the final cap extent. By email dated May 11, EPA accepted the field sampling plan with one clarification. Weston will distribute the final field sampling plan to the parties involved. The sampling program began on Wednesday, June 10, 2020.

6.5 An emergency permit modification to address additional streambank erosion in Slingtail Creek was granted by NJDEP on October 23, 2019. The Soil Erosion and Sediment Control Plan (SESCP) application was submitted to Freehold Soil Conservation District (FSCD) on January 31, 2020 and approved on March 10, 2020. FSCD did not require permit approval in advance of the emergency repair. Work began on February 24, 2020 and construction was completed on March 5, 2020.The permit modification is being finalized for submittal to NJDEP. Weston is evaluating potential additional areas of streambank erosion; a survey was conducted in May. Weston is awaiting approval from NJDEP of the Riparian Zone Mitigation Plan; once approval is granted, Weston will proceed with plantings.

6.6 Weston has completed the remediation of Hatco-related contaminants identified in Woodbridge Pond sediments (Hatco AOC 24). The final walk through with Woodbridge Township, the property, owner was completed on September 27, 2019. Weston is currently preparing the Remedial Action Report for AOC 24.

6.7 During the Woodbridge Pond remediation project an isolated area of PCB-contaminated sediment was identified in the wetland portion of the adjacent Crown Relocators property (part of Hatco AOC 23). Weston is preparing the permit modification application necessary to remove the isolated area of PCB-contamination identified.

6.8 Water was observed seeping out of the ground at the decommissioned seep interceptor vault system. Iron staining was noted on the surface of the surrounding pavement. No evidence of LNAPL or PCB exceedances were detected in the samples of water from the vault in June 2019 and February 2020. Weston pumped out the vault on March 27, April 1, and April 15, and May 6 to prevent further seepage and is working to develop a permanent solution for the situation.

6.9 Weston is continuing preparation of the remedial action progress reports for the completed Southeast Leg, Northeast Impoundment and Former Lagoon Cap remediation projects.

6.10 On September 19, 2019, Weston and the LSRP worked with NJDEP to combine the regulatory case involving the discharge to the reconstructed onsite wetlands (reported on June 19, 2018; Case No. 18-06-22-1109-21) with the Hatco remediation project. Weston has prepared the sampling plan to assess the onsite wetland; the plan was submitted to USEPA for review on January 30, 2020. USEPA and NJDEP provided comments on February 11, 2020. Weston provided a response to the comments on March 13, 2020. Phase 1 sampling was completed on April 23, 2020. Weston is evaluating the data and will provide recommendations for the Phase 2 Sampling program in July.

7. Specific Requirements Scheduled for Completion, but not Completed During the Reporting Period:

7.1 Update scope and schedule for Channel D remediation.

8. Explanation for Each Item of Non-Completion in Item 7:

8.1 Weston is currently in discussions with the property owners for Channel D and will update the scope and schedule based on those discussions.

9. Specific Requirements to be Initiated in Next Reporting Period (June - August 2020):

    9.1 Continue preparation of Southeast Leg, Northeast Impoundment, and Former Lagoon Cap Remedial Action Progress Reports, and Woodbridge Pond Remedial Action Report.
    9.2 Confer with USEPA to review preliminary engineering plans for site-wide capping of remaining contaminated soil.
    9.3 Complete site-wide cap sampling program.
    9.4 Implement Phase 2 sampling of the Southeast Leg Pond Area.