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DEPARTMENT OF ENVIRONMENTAL PROTECTION
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June 15 2017

Andrew Park, Project Manager
Corrective Action Section
Hazardous Waste Programs Branch
U.S. Environmental Protection Agency Region 2
290 Broadway, 22nd Fl.
New York City, NY 10007-1866

RE: Amerada Hess Corporation Port Reading Refinery
750 Cliff Rd
Woodbridge, Middlesex
EPA ID No. NJD045445483
PI #: 006148

Dear Mr. Park:

The New Jersey Department of Environmental Protection (Department) has completed an initial review of the submission "Remedial Investigation Report/Remedial Action Report AOC – 19: QC Laboratory" dated June 2017. This initial review does not include specific comments from the NJDEP Geologist, or Technical Coordinator. This review identifies deficient submissions that must be corrected to advance the review with the case team.

AOC – 19: QC Laboratory RIR/RAR Comments

Page 4 identifies all four USTs as having contained "Waste Oil". In earlier communications with Hess, the Department established the position that the "Waste Oil" tanks contained RCRA hazardous waste solvents, generated by the QC Lab as a function of the laboratories activities. In accordance with N.J.A.C. 7:26E-2.1(c)ii., the required analytical for all environmental media is: The Target Compound List plus TICs/Target Analyte List (TCL + TICs/TAL), hexavalent chromium, extractable petroleum hydrocarbons (EPH), and pH when contaminants are unknown or not well documented. Those compounds are required in addition to the requirements identified in Table 2-1 at N.J.A.C. 7:26E-2.1(e). The submission fails to provide the required analytical data.

Page 5 notes that impacts were "likely associated with releases from UST T-2". Page 6 identifies a temporary well point was placed at UST T-1 and sampled for VOCs, Base Neutral compounds, Metals, and ammonia. But there was no well placed at UST T-2. The well point at UST T-1 fails to provide groundwater data for the known discharge location (T-2). Further the analytical deliverable fails to comply with the Technical Requirements for Site Remediation, as noted in my prior comment.

Page 6 identified the soil sample analytical was limited to EPH, BNs, VOCs, Metals and Hexavalent Chrome, which fails to comply with the Technical Requirements for Site Remediation

Page 7, section 5.2 states that temporary wells were installed in the vicinity of Tank T-1 and T-2. The depth to groundwater and top of casing elevation must be provided in the report and the data points used in the figure for the groundwater contour for the AOC. The temporary wells were sampled for VOCs and SVOCs, but as noted in the above comment, the regulations required the Target Compound List plus TICs/Target Analyte List (TCL + TICs/TAL), hexavalent chromium, extractable petroleum hydrocarbons (EPH), and pH when contaminants are unknown or not well documented. Those compounds are required in addition to the requirements identified in Table 2-1 at N.J.A.C. 7:26E-2.1(e).

Page 10 Section 6.1 identifies approximately 478 tons of contaminated soil was excavated and disposed off-site. This Department in earlier communications established that the QC Laboratory Waste Oil Tanks received regulated RCRA hazardous waste, specifically, RCRA regulated hazardous waste solvents. Subsequently, the excavated soils would be contaminated with RCRA hazardous waste. The RAR fails to provide waste analysis documentation used to verify the soils were not RCRA hazardous waste.

Figure 3 – "QC Lab Parcel" does not show any boundaries of the parcel for the AOC that Hess intends to obtain an RAO and then later transfer the property to another owner. Figures available to NJDEP that identify parcels indicates the lot and block of that parcel (Block 664.01/Lot 1.02) extends well beyond the former building and includes the AOC identified as the "Drum Compound". The figure lacks common place identifiers such as street names.

Figure 4.1 and 4.2 – "Groundwater Contour Map" identifies the location of the three groundwater monitoring wells, MW-1, MW-2 and MW-3. The isopleth of the groundwater represents approximately one tenth of an acre while the parcel measures close to 3 acres. Subsequently, the investigation of the groundwater in the AOC is incomplete since it is not encompassing the entire AOC, only a very small part of the AOC.

Not identified on any of the figures are AOC – 90 and AOC – 103, which appear to be located on the same parcel that Hess intends to transfer to another party. One of the earlier CID submissions stated further investigation was planned for soil impacts of this area. Without that analytical data, the remedial investigation is incomplete as well as the remedial action. The Department notes that aerial photographs appear to identify an easement in this AOC. The nature of the easement and any underground structures must be identified in figures and maps. AOC 103 is identified as "Fire Pits" and they must be investigated for te presence of perfluoroalkyl and polyfluoroalkyl substances (USEPA Method 537) in soils and groundwater, as it is believed firefighting foam (AFFF) may have been used in this AOC.

N.J.A.C. 7:26E-1.6(a)3. Failed to submit Case Inventory Document (CID) that identifies the status of all AOCs at the facility, and not limited to one AOC.

N.J.A.C. 7:26E-1.6(a)4. Failed to submit a quality assurance project plan prepared in accordance with N.J.A.C. 7:26E-2.2 with the RI/RA report

N.J.A.C. 7:26E-1.6(a)6. Failed to provide a geographic information system (GIS) compatible site plan that includes the site boundaries and the location of all areas of concern as polygons.

N.J.A.C. 7:26E-1.6(b)7iii. Monitoring well Certification Forms were submitted with the RIR/RAR for the four wells identified as MW-1, MW-2, MW-3 and MW-4. However, the groundwater contour map is deficient as it does not reflect groundwater within the AOC in its entirety. The figure shall be updated using all relative and pertinent wells to provide a contour map applicable to the entire AOC. The Monitoring Well Certification Form submissions shall also include these additional wells.

N.J.A.C. 7:26E-4.3(a)6. The groundwater contour map fails to accurately determine fate and transport in groundwater.

N.J.A.C. 7:26E-4.3(b)1. Failed to collect a sufficient number of groundwater samples to delineate the horizontal and vertical extent of groundwater contamination as represented in the groundwater contour map.

N.J.A.C. 7:26E-5.7(b)10. Failed to Provide the total remediation cost through the implementation of the remedial action.

The Department notes that there are no variances from the technical requirements provided for deviations from the regulations as required by N.J.A.C. 7:26E-1.6(b)4.

The Department recommends meeting with Hess Corporation representatives to review this submission and allow Hess Corporation to present clarifying information. If additional information is to be submitted, the existing submission will be withdrawn from the case team review, pending submission of revised documentation.

If you have any questions regarding this correspondence, please reach me by phone at (609) 292-0395, or email at Phil.Cole@dep.nj.gov.

Sincerely,

Philip Cole, Case Manager
Bureau of Case Management

cc: John Schenkewitz, Hess Corporation
John Virgie, LSRP, Earth Systems
Jill Monroe, NJDEP Geologist
Ann Charles, NJDEP Technical Coordinator