TIERRA SOLUTIONS, INC.

June 16, 2004

U.S. Environmental Protection Agency, Region II
Emergency and Remedial Response Division
Diamond Alkali Superfund Site/Passaic River Study Area
290 Broadway, 19th Floor, Room W-20
New York, NY 10007-1866

Attention: Mr. Ray Basso
Strategic Integration Manager

Subject: Monthly Progress Report No. 122
Passaic River Study Area

Dear Mr. Basso:

Submitted herewith are two (2) copies of Monthly Progress Report No. 122 for work performed during May 2004 at the Passaic River Study Area. This progress report has been prepared pursuant to Section X, Paragraph 64 of the Administrative Order of Consent between U.S. Environmental Protection Agency and Occidental Chemical Corporation, Index No. II-CERCLA-0117.

If you have any questions, please contact me at (732) 246-5851.

Sincerely,

Clifford Firstenberg (L.S.)

Clifford Firstenberg
Project Manager
On behalf of Occidental Chemical Corporation
(as successor to Diamond Shamrock Chemicals Company)

(2 copies sent)

Attachment

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10thfloor
TwoTowerCenterBlvd.EastBrunswick,NewJersey08816

2c: NJDEP-Bureau of Federal Case Management
401 East State Street - CN 028
Trenton, NJ 08625-0028
Attn: Jerri Weigand

1c: Chief, New Jersey Superfund Branch
Office of Regional Counsel
U.S. Environmental Protection Agency
290 Broadway, 19th Floor, Room W-20
New York, NY 10007-1866
Attention: Diamond Alkali Site Attorney - Passaic River Study Area

MONTHLY PROGRESS REPORT NO. 122
PASSAIC RIVER STUDY AREA
WORK PERIOD: May 2004

A. Actions Taken Toward Achieving Compliance with the Order

1. Continued to screen remedial technologies.

2. Continued development of the RI Report.

B. Actual or Potential Violations and Other Problems Encountered:

No actual or potential violations. The following problems have been encountered:

1. SED2DV45 does not appear to conserve mass (first reported in Monthly Progress Report No. 78, September 2000).

2. SED2DV45 test case model results differ between WES and Tierra (first reported in Monthly Progress Report No. 78, September 2000).

3. Lack of surface water data precludes assessing a number of receptors in the human health risk assessment and in developing an ecological risk assessment consistent with EPA guidance that considers the surface water pathway (first reported in Monthly Progress Report No. 78, September 2000).

C. Corrective Actions:

1. A number of tests to evaluate the lack of mass conservation in SED2DV45 have been conducted. Tierra submitted a letter to EPA and WES reporting on the results of additional testing (October 31, 2000).

2. A number of tests to determine the cause of differing model results between SED2DV45 run by WES versus SED2DV45 run by Tierra will be completed upon resolution of the lack of mass conservation.

3. Tierra submitted a letter describing the missing surface water data and a recommendation for mitigating the problem (October 19, 2000).

MONTHLY PROGRESS REPORT NO. 122
PASSAIC RIVER STUDY AREA
WORK PERIOD: May 2004
(continued)

D. Validated Sampling or Testing Results Received or Generated During the Course of Implementing the Work:

1. None.

E. Future Plans, Actions and Data Scheduled for June and July 2004:

1. Pending resumption of modeling program, determine the cause of different model results for SED2DV45 run by WES versus SED2DV45 run by Tierra, and communicate to EPA and WES.

2. Pending resumption of the modeling program, resume implementation of the protocol for evaluation of the potential use of the STUDH-2000 (SED2DV45) beta model for the Passaic River Study Area, upon resolution of the two identified problems (lack of mass conservation and differing results between Tierra and WES versions of the model).

3. Pending Tierra's request for a meeting with EPA (CLH letter dated February 16, 2001, prepared in response to EPA's letter dated January 30, 2001), continue work on the second human health risk assessment interim deliverable according to RAGS Part D.

4. Pending Tierra's request for a meeting with EPA (CLH letter dated February 16, 2001, prepared in response to EPA's letter dated January 30, 2001), continue work on the second ecological risk assessment interim deliverable according to ERAGS.

5. Continue collecting and assessing information on remedial technologies to evaluate need for treatability testing.

6. Revise CSO WP/FSP and QAPP pending EPA instructions on comments and/or meeting.

7. Mobilize for CSO field work pending EPA approval of WP/FSP and QAPP.

8. Continue development of the RI Report.

9. Resume development of the Surface Water Sampling Plan pending EPA's review of the need to fill the data gap identified by Tierra on October 19, 2000.

F. Work Completion Estimates:

1. The RIWP is 100% complete.

2. The FSWP is 100% complete.

3. The Graphic Data Representation is 100% complete.

4. The Model Test Case Report is 100% complete.

5. The Screening-Level HERA is 100% complete.

6. The Alternatives Array Document is 35% complete.

7. The Ecological Sampling Plan is 100% complete (i.e., original submittal to EPA).

8. The Calibration and Verification Status Report is 100% complete (i.e., original submittal to EPA)

9. Creel/Angler Survey Work Plan is 100% complete (i.e., original submittal to EPA)

10. Preparation of RI Report is 35% complete.

G. Delays Encountered or Anticipated and Mitigation Actions:

1. Lack of mass conservation in SED2DV45 and the tests being performed to determine the cause may delay completion of the implementation of the protocol for evaluation of the potential use of the STUDH-2000 (SED2DV45) beta model for the Passaic River Study Area.

2. Differing model results between WES and Tierra when running standard model input using SED2DV45 and the tests being performed to determine the cause may delay completion of the evaluation of the potential use of the STUDH-2000 (SED2DV45) beta model for the Passaic River Study Area.

3. The lack of surface water data can be addressed through implementation of a surface water collection program. There is no plan or schedule for this activity pending EPA's response to Tierra's request submitted on October 19, 2000.

4. EPA's letter dated January 30, 2001 advised (i.e., "should") Tierra to "cease" sediment transport modeling, recommended that Tierra "suspend" risk assessment work, and advised (i.e., "should") that Tierra "suspend" treatability activities until further notice. Tierra requested in its response letter dated February 16, 2001, to meet with the Agency, either separately on each of these topics, or together on the three. EPA's directive has a direct impact on the project schedule, which is now in delay pending a meeting with the Agency and/or EPA's directive to resume these required activities.