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OXFORD ENVIRONMENTAL INC.

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October 10, 2000

U. S. Environmental Protection Agency
Region II, Removal Action Branch
2890 Woodbridge Avenue
Edison, NJ 08837

Attention: Mr. Eric Wilson/Mr. Nick Magriples, On-Scene Coordinator

Subject: **Removal Action Work Plan Addendum - 126 Spicer Avenue**
Cornell-Dubilier Electronics Superfund Site
South Plainfield, Middlesex County, New Jersey
Index Number CERCLA-02-2000-2005

Dear Sirs:

The following addendum addresses concerns listed in USEPA's letter dated 09/20/00 about the Removal Action Work Plan (RAWP), 126 Spicer Avenue, South Plainfield, NJ (CERCLA 02-2000-2005) that Oxford Environmental Inc. submitted for your review. This addendum also proposes an alternative method to confirm the extent of excavation delineation that uses an USEPA accepted file screening technique.

Addendum to Section 2.3

Vertical Delineation

Oxford Environmental proposes to use Strategic Diagnostics Inc. EnSys field test kit along with laboratory verification analysis to delineate the vertical extent of PCB contamination. Oxford will test the three locations listed in USEPA's comments. These locations are shown on Figure 4 (Rev 10/10/00) attached to this addendum. Oxford will carryout the delineation as follows:

- Use a hand auger to obtain soil samples at the depths of six (6) and twelve (12) inches below ground surface at each of the sample locations shown on Figure 4.

- Use an EnSys field test kit calibrated to measure concentrations of PCB Aroclors 1254 and 1260 at a detection limit of 1.0 ppm to extract PCB from each soil sample and analyze the extract for PCB content.

- In the case where both samples show PCB concentration of less than 1.0 ppm (that is, detection limit) Oxford will establish one (1) foot as the extent of vertical contamination

in that area. Oxford will submit a split sample from the soil sample taken at the one (1) foot depth for laboratory analysis for PCB concentration.

- Alternatively, Oxford will continue to obtain soil samples at six (6) inch intervals (up to a maximum of three (3) feet below ground surface) until the field test shows that two (2) consecutive samples show less than 1.0 ppm PCB. As described above, Oxford will consider this depth as the extent of vertical excavation in that area. Oxford will take a split soil sample from the soil sample taken at this depth for laboratory analysis.

- Oxford will also prepare sample dilutions to measure PCB concentrations up to 5.0 ppm and re-test any sample that shows greater than 1.0 ppm in an attempt to quantify PCB concentration.

- In cases where Oxford's field sampling shows that PCB concentration is either increasing with depth (say greater than 5.0 ppm) or that the PCB concentration is greater than 1.0 ppm at a depth of three (3) feet below ground surface, Oxford will consult with USEPA and develop an alternate RAWP. This finding requires that Oxford re-evaluate the statistical methods used to develop this RAWP.

Perimeter Delineation and Confirmation of Vertical Excavation Depth

Oxford will also confirm the limits of perimeter excavation shown on the revised Figure 4 as described below.

Oxford will use an LnSys field test kit calibrated as described above to test sidewalls (that is, perimeter) and bottom samples as described in the RAP (See RAWP, Section 3.2) submitted to USEPA for each of the three (3) areas proposed for excavation. Oxford will use the following method to do this:

- Oxford will use a hand auger to obtain the requisite number of perimeter and bottom samples at the vertical excavation depth a (as determined above) from locations shown on Figure 4. Oxford will confirm the perimeter and bottom excavation depths when field-testing shows a PCB concentration of less than 1.0 ppm PCB. Oxford will take a split soil sample from the bottom soil sample that shows less than 1.0 ppm PCB for laboratory analysis.

- In cases where perimeter testing shows PCB concentration of greater than 1.0 ppm PCB at any of the perimeters shown on Figure 4, Oxford will obtain (2) two additional perimeter samples at distances at five (5) and ten (10) feet outward from the perimeter sample point that is greater than 1.0 ppm PCB. Oxford will proceed at five (5) foot

intervals in an attempt to locate a perimeter point where field-testing shows a PCB concentration of less than 1.0 ppm.

- In cases where additional bottom sampling shows PCB concentrations of greater than 1.0 ppm PCB Oxford will re-evaluate the depth of excavation in six (6) inch intervals up to a depth of three (3) feet as described above in an attempt to establish a revised depth of vertical excavation.

- Oxford will also prepare sample dilutions to measure PCB concentrations up to 5.0 ppm and re-test any sample that shows greater than 1.0 ppm in an attempt to quantify PCB concentration.

- In cases where Oxford's field sampling shows that PCB concentration is increasing as either perimeter or bottom sampling proceeds (say greater than 5.0 ppm) or that the PCB concentration is greater than 1.0 ppm at a depth of three (3) feet below ground surface, Oxford will consult with USEPA and develop an alternate RAWP.

The following summarizes the samples for each of the three areas:

AREA A
Two (2) perimeter samples
One (1) bottom sample
One (1) split soil sample from bottom depth for laboratory analysis

AREA B
Five (5) perimeter samples
Two (2) bottom samples
One (1) split soil sample from bottom depth for laboratory analysis

AREA C
Three (3) perimeter samples
One (1) bottom sample
One (1) split soil sample from bottom depth for laboratory analysis

Addendum to Section 4.2

Oxford believes that the sampling strategy proposed above addresses USEPA's concerns about the content of the 3rd and 4th bullet items in this Section

Addendum to Section 4.3

Oxford will delete the word "arithmetic".

Addendum to Section 4.4

Oxford will secure excavation areas not filled at the end of a workday with construction fence.

Addendum to Section 4.5

The sampling strategy eliminates the need to stage soil on plastic on-site. However, in case any soil is spilled onto sod, this sod will be removed and replaced.

Addendum to Section 4.6

All equipment that remains on –site during construction will be secured in a designated area and secured with construction fencing.

Addendum to Section 4.7

Before excavation begins a Certified Professional Soil Specialist (CPSS) will travel to the source of the proposed fill and topsoil. The CPSS will evaluate the proposed fill and topsoil and provide a certification that this material is from a virgin source (that is, without industrial or agricultural use). The CPSS will request analysis that shows that the soil reaction is neutral (pH 6.6 - 7.3) and that the topsoil soil texture corresponds to loam soil texture with an organic matter content of 1 – 3 percent. The soil reaction of the fill will also be neutral and correspond to a loam, sandy loam, or gravely sandy loam texture. All texture will correspond to the textural classification of the by the U S Department of Agriculture, Natural Resources Conservation Service.

Alternatively, the CPSS will identify that this fill and topsoil is not from a virgin source. The CPSS will request soil analysis as listed above to determine its textural and suitability as a plant growth medium. In addition the CPSS will obtain representative samples at the rate of one sample per 1000 cubic yards of fill and topsoil material. (Available estimates suggest that approximately 2,778 cubic feet of fill and topsoil is needed.) Each sample will be analyzed to identify Target Compound List plus 30 and Target Analyte List parameters. The CPSS will compare the results of testing with NJDEP Soil Cleanup Criteria and certify

that the sample data for the fill and topsoil testing meets the NJDEP residential direct contact standards.

Addendum to Section 5.4

Oxford will obtain services of a recognized security service that will inspect the work site every four (4) hours after work stops to identify acts of vandalism. The security service will report any acts of vandalism to Oxford's project manager
on-site, presence if resident is to be located

Addendum to Section 6.2

? Oxford will submit waste profiles, etc, including copies of sample waste manifest to USEPA for review 5 days before shipment.

APPENDIX B

Addendum to Section 6.2

Attached to this is an addendum that describes a procedure that the site Health and Safety Officer (HSO) will use to evaluate the hazards that each job presents and to determine the type of engineering control to eliminate hazard or Personal Protective Equipment (PPE) needed to protect workers.
Not attached

? The site HSO will monitor sound levels at the start of project work and at other times to document that sound levels do not exceed 90 dBA or impact noise levels do not exceed 140 dBA. In cases where sound levels exceed these limits the HSO will evaluate the need for hearing protection based on OSHA Hearing Conservation Standard.

Addendum to Section 6.3.1

All employees will use PPE to protect from incidental dust contact as follows:

- Employees working in excavation machines;
- Paper Tyvek with disposable booties in case exit of machine is needed;
- Employees assisting with excavation (working as spotter, confirming excavation depth;

- Paper Tyvek, surgical gloves, covered with taped Nitrile glove, and work gloves (as needed), hard hat, safety glasses with side shields, and taped rubber boots over work shoes;

- Employees will have earplugs available in case noise levels exceed 90 dBA as described above.

In addition, all employees will perform self-decontamination when leaving the work area. At a minimum this will consist of:

1. Equipment drop

2. Suit and hard hat water rinse, boot wash with detergent followed by water rinse, and glove wash.

3. Second boot wash and water rinse, tape removal, boot removal, rinse, hard hat removal Nitrile glove, and suit removal, inner glove removal.

4. Field wash using pre-moistened towelettes

Addendum to Sections 6.3.2 and Section 10.1

Oxford will use a DataRAM to ensure that ambient dust concentration in the area of excavation and downwind do not exceed 10 mg/m3. In addition, the HSO will ensure that no visible dust emissions occur and that all areas are misted using Hudson-type sprayer to prevent visible dust emission.

Addendum to Appendix C

Confirmation of disposal facility to follow.

Addendum to Appendix E

Restoration plan to follow. However, no impact except to sod cover and incidental foundation plantings anticipated at this time. Oxford will use sod cover to replace disturbed lawn areas. Plant material will have a one-year guarantee from the date of USEPA acceptance

inventory of plants / replacements required
ck drawings

Should you have any questions or concerns, please contact the undersigned at (973) 244-0600.

Very truly yours,

Timothy M. Francisco
Project Coordinator

cc: M. Sundram, Ph.D., Esq. - USEPA (1 copy)
L. Coraci - DSC of Newark Enterprises (1 copy)
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Phone:	732-906-6930	Date:	~~10/10/00~~ 10/11/00
Re:	CORNELL-DUBILIER	CC:	

☐ Urgent ☐ For Review ☐ Please Comment ☐ As Requested ☐ Confidential

• Message:

OCT 10 2000

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