SHERWIN-WILLIAMS.

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January 30, 2008

Mr. Ray Klimcsak
United States Environmental Protection Agency
Region 2
290 Broadway, 19th Floor
New York, NY 10007-1866

RE: Sherwin-Williams Gibbsboro Sites
Response to USEPA Comments (January 16, 2008)
Evaluation of Strategic Sampling Results, U.S. Avenue Burn Site and Associated Reaches of Honey Run and White Sands Branch (June 19, 2006)
AOC Index Number: No. II CERCLA-02-99-2035

Dear Mr. Klimcsak:

Sherwin-Williams has received the comments dated January 16, 2008 from the United States Environmental Protection Agency (EPA) Region II New Jersey Remediation Branch concerning the *Response to USEPA Comments* dated September 24, 2007 of the June 19, 2006 *Evaluation of Strategic Sampling Results – U.S. Avenue Burn Site and Associated Reaches of Honey Run and White Sands Branch* submitted by The Sherwin-Williams Company (Sherwin-Williams).

Sherwin-Williams has incorporated EPA's comments to this January 16, 2008 comment letter into a revised version (submitted herein) of the *Response to USEPA Comments* document dated September 24, 2007. Revisions are noted in red. A copy of the January 16, 2008 USEPA Comment letter is included with this revised submission.

In addition, on January 22, 2008 a project meeting was held at the Gibbsboro site between USEPA and Sherwin-Williams to discuss the particulars of the proposed Burn Site sampling program. The agreed upon clarifications and revisions to the sampling program are included as part of this response. These clarifications and revisions are intended to clarify and supersede the sampling program discussed in this document.

A revised Figure 6 is attached showing all proposed sampling locations.

282381

EPA REGION II NEW JERSEY REMEDIATION BRANCH COMMENTS

White Sands Branch

General Comment

1. *EPA concurs with the proposal to complete the additional transect sampling (as presented in Figure 6) at the following locations: WST-2, WST-3, WST-6 and WST-7, for both soil and sediment sample collection.*

Response: Sherwin-Williams will complete the additional transect sampling, as proposed. Sample collection and analysis will be conducted as discussed in the March 21, 2007 Technical Memorandum, "Revised Soil and Sediment Sampling and Analysis Protocol Incorporating X-Ray Fluorescence (XRF)" (XRF Technical Memorandum).

Additional field screening for volatile organic compounds (VOCs) and sample analysis for VOCs and semivolatile organic compounds (SVOCs) for samples collected from the northern bank of White Sands Branch in WST-2 and WST-3 will be included as requested in Comment #3, "Soil Sampling".

Sediment Sampling

1. *The EPA concurs with the proposal to reduce the list of analytical constituents to TAL metals for sediment sample analysis along White Sands Branch (WSB).*

Response: Sherwin-Williams acknowledges the above-referenced comment and will implement the proposed changes to the list of Contaminants of Potential Concern (COPCs). The analytical parameters for all additional sediment samples collected along White Sands Branch will be limited to TAL metals.

2. *Based on the 2005 sediment data, nine out of the eleven WSB sample locations (including the culvert sample location WSDD0029) had exceedances at depth for either arsenic or lead. Additional vertical delineation sampling should be proposed at the following WSB transects: 1, 4, 5, and 8, and at culvert sample location WSDD0029 for TAL analysis.*

Response: Sherwin-Williams proposes to return to each of the transects and the culvert location referenced by the EPA Region II New Jersey Remediation Branch to collect additional samples for vertical delineation. Sherwin-Williams will collect the additional samples from the approximate centerline of the stream at locations that correlate to previous sampling locations WSDD-0007 (WST-1), WSDD-0011 (WST-4), WSDD-0013 (WST-5), WSDD-0017 (WST-8), and WSDD-0029 (culvert sample). Samples will be collected beginning at the 2.5' – 3.0' interval (one foot below the deepest samples collected during the 2005 Strategic Sampling Program), and the protocol for field screening and sample collection for laboratory analysis presented in the March 21, 2007 XRF Technical Memorandum will be used.

Soil Sampling

3. *At WST-8 it has been proposed that additional horizontal delineation samples will be collected 20 ft. beyond those samples collected in 2005; however, vertical delineation sampling should be performed at two of the previous (interior) sample locations. Specifically, at sample locations WSSB0001 and WSSB0002 further vertical delineation is necessary due to the fact that only one sample was collected at each location and exceedances were present.*

   All 2005 soil samples collected along the remaining White Sands Branch transects (WST) (i.e., 1, 4, and 5) had exceedances (except for sample location WSSB0015) at both the shallow and deep intervals. Based on this fact, additional vertical delineation is necessary at previous sampling locations along each of the transects. In addition, horizontal delineation along WST-5 has not been fully characterized. As such, additional samples, on both sides of WSB, should be proposed. Finally, for soil samples collected from the northern bank of WSB that are proposed for collection along WST-1, WST-2, and WST-3 should be analyzed for VOCs and SVOCs in addition to TAL Metals. All other soil samples can be analyzed for TAL metals only.

Response:

WST-8
Additional samples for vertical delineation will be collected from locations WSSB-0001 and WSB-0002. Sample collection will begin at the 1.5' – 2.0' interval, and additional sample collection and analysis will be performed in accordance with the March 21, 2007 XRF Technical Memorandum.

Horizontal Delineation, WST-5 -

Additional borings will be installed approximately 25 feet north of location WSSB-0020 and south of location WSSB-0022, where lead and arsenic were found at concentrations greater than screening criteria. Soil samples will be collected from 0.0 to 0.5 ft. below ground surface (bgs) [AA-AB interval] and from 2.0 to 2.5 ft. bgs (AE-AF) in accordance with the Hilliard Creek sampling protocol specified in the EPA Comment Letter dated May 3, 2006. Additional vertical delineation will be performed in 2.0 feet increments (4.0 to 4.5 ft. bgs and so on). The field screening and selection for laboratory analysis will be performed as per the March 21, 2007 XRF Technical Memorandum. These samples will be analyzed for TAL metals only.

Vertical Delineation, White Sands Branch Strategic Sampling, Transects WST-1, WST-4 and WST-5
Additional vertical samples will be collected from locations WSSB-0013 and WSSB-0024 (WST-1), WSSB-0016 and WSSB-0017 (WST-4), and WSSB-0021 and WSSB-0022 (WST-5). At all locations except WSSB-0024, sample collection will begin at the 2.5' – 3.0' interval, and sample screening, collection and analysis will be conducted as per the March 21, 2007 XRF Technical Memorandum.

Sample collection at WSSB-0024, located on the northern bank of White Sand Branch, will begin at the 7.5' – 8.0' interval (one foot deeper than the deepest sample collected during the Strategic Sampling). Samples will also be collected from the 9.5' – 10.0' and 11.5' – 12.0' intervals. Sample collection, screening and selection for laboratory analysis from these intervals as well as deeper intervals, if necessary, will be performed as per the protocol presented in the March 21, 2007 XRF Technical Memorandum with the following additions:

- All samples will also be field screened with a photoionization detector (PID) to evaluate the potential presence of VOCs and volatile SVOCs.

- All samples selected for laboratory analysis from transects WST-1, 2 or 3 from the northern bank of White Sands Branch will be analyzed for VOCs, SVOCs and TAL metals. This includes location WSSB0024 (WST-1). All other samples will be analyzed for TAL metals only.

- If the field team notes evidence of potential organic constituents, such as PID readings significantly greater than background, staining, or organic odors, in the deepest sampling interval (as determined by the XRF results), samples will be obtained from one or more additional vertical intervals until the evidence of potential organic constituents is no longer observed.

<u>Sampling Protocol, Remaining Transects WST-2, WST-3, WST-6 and WST-7</u>
As presented in the June 19, 2006 proposed scope of work, Sherwin-Williams will complete the sampling of all of the remaining White Sands Branch transects proposed in the approved November 2003 Work Plan. Sample locations will be selected based on the approved November 30, 2005 "Recommendations for Remedial Investigation Scope" for Hilliard Creek, and the sample collection, screening and sample selection for laboratory analysis will be conducted according to the protocols described in the XRF Technical memorandum. Additionally, Sherwin-Williams will incorporate the USEPA Region II New Jersey Remediation Branch requirement that all samples collected from the northern bank of White sands Branch be analyzed for VOCs and SVOCs.

As per the approved "Recommendations for Remedial Investigation Scope" for Hilliard Creek, soil samples will be obtained from the following locations on each side of White Sands Branch at each of the four remaining transect locations:

- The creek's edge and the immediate top of the stream bank;

- 20 feet from the first sample, along the transect; and

- Every 50 feet until the end of the transect is reached.

Sediment samples will be obtained every ten feet within White Sands Branch.

As per the approved Hilliard Creek protocol, soil samples will be obtained from 0.0 to 0.5 ft. bgs (AA-AB interval) and 2.0 to 2.5 ft. bgs (AE-AF interval) regardless of the depth to ground water. Sediment samples will be obtained from 0.0 to 0.5 ft. bgs (AA-AB interval) and 2.5 to 3.0 ft. bgs (AF-AG interval).

As per the approved XRF Technical Memorandum, the samples will be field screened with the XRF unit. If the XRF results find that one or more constituents exceed the screening criteria, additional vertical and/or horizontal samples will be obtained.

Consistent with the additional vertical delineation at WSSB-0024, samples collected from the northern bank of White Sands Branch in WST-2 and WST-3 will be field screened with a PID, and the results will be used to determine whether additional vertical samples are needed.

All samples collected from transects WST-2 and WST-3 from the northern bank of White Sands Branch that are sent to the laboratory for analysis will be analyzed for VOCs, SVOCs and TAL metals. All other samples will be analyzed for TAL metals only.

Surface Water Sampling

1. *At this time, no additional surface water samples are recommended.*

Response: Sherwin-Williams acknowledges the above-referenced comment and concurs that no additional surface water samples are proposed for this phase of investigation.

Honey Run

Sediment Sampling

1. *Lead and arsenic sediment concentrations within Honey Run are generally lower than those found within WSB, however, the highest concentrations of both constituents are found in sediment samples collected from transect HRT-4. HRT-4 is located at the eastern most edge of the U.S. Avenue Burn site. In addition to the 2005 data, previously collected samples: SD-23, SD-24 and SD-25 (which are situated close to, or outside of the site boundary) also show that levels of lead and arsenic exist which exceed sediment screening criteria. Therefore, it is required that two additional transects be placed outside the fenced area (for soil and sediment sample collection) and be analyzed for TAL Metals and SVOCs.*

Response: Sherwin-Williams will sample two additional transects across Honey Run, as presented on Figure 6. The first is approximately 50 feet southeast of the fence line, and the second in approximately 100 feet southeast of the first.

Borings will be installed according to the approved sampling protocol used for the second phase of sampling at Hilliard Creek.

Sediment Samples – Consistent with the proposed protocol for White Sands Branch, borings will be installed every ten feet within the stream channel for purposes of sediment sample collection. Samples submitted for laboratory analysis will be analyzed for TAL Metals and SVOCs.

Soil Samples - One boring will be installed at the top of each side of the stream bank and approximately 20 feet further into the flood plain. Additional borings will be installed at 50-foot intervals until the XRF screening results indicate that the screening levels have not been exceeded. Samples submitted for laboratory analysis will be analyzed for TAL Metals and SVOCs.

As specified by the EPA Region II New Jersey Remediation Branch (see comment under "Soil Sampling), all borings will extend at least eight feet in depth. The borings will be field screened with the XRF at the surface (0.0 to 0.5 ft. bgs.) and at 2.0 to 2.5 ft. bgs. Subsequent samples will be collected at two-foot intervals - 4.0 to 4.5 ft. bgs, 6.0 to 6.5 ft. bgs and so on. If the XRF results find constituents above screening criteria in one or more intervals, samples will be collected for laboratory analysis for TAL metals and SVOCs at the following depths:

- The shallowest depth interval showing XRF results above screening criteria;
- The deepest depth interval showing XRF results above screening criteria; and
- The depth interval immediately below the deepest interval showing XRF results above screening criteria.

Additional horizontal borings will be installed according to the protocol in the March 21, 2007 XRF Technical Memorandum if XRF results show constituents at concentrations greater than screening criteria in the outermost borings in one or more transects.

Soil Sampling

1. *For soil samples located on the southern shore of Honey Run, the extent of vertical contamination must be delineated at the following locations previously sampled in 2005: HRSB001 (exceedance), HRSB0004 (exceedance), HRSB007 (sampled one interval only), and HRSB00011 (need to confirm that contamination does not begin at a depth of 4ft., which is typical for samples in this area). Sampling (or XRF screening activities) must be performed to the depth of at least 8.0 ft. for all locations. This screening depth must also be used at the newly proposed HRT transects outside of the eastern fence edge. All soil samples should be analyzed for TAL Metals and SVOCs.*

Response: Sherwin-Williams will install additional borings and collect additional samples in the locations identified by the EPA Region II New Jersey Remediation Branch for the purposes of completing vertical delineation and determining soil conditions at depths greater than those sampled during the 2005 Strategic Sampling Program. Each boring will be a minimum of eight feet deep. Except for boring HRSB-

0007, the first sample screening and sampling interval will be at 3.5' to 4.0'. The first screening and sampling interval for HRSB-0007 will be 2.0 to 2.5 ft. bgs to maintain consistency with the Hilliard Creek soil sampling protocol. Samples will be collected, field screened and analyzed according to the protocol in the March 21, 2007 XRF Technical Memorandum and all samples selected for laboratory analysis will be analyzed for TAL Metals and SVOCs.

Surface Water Sampling

1. *At this time, no additional surface water samples are recommended.*

Response: Sherwin-Williams acknowledges the above-referenced comment and concurs that no surface water samples will be collected during this phase of the investigation.

U.S. AVE. BURN SITE - SOIL SAMPLING

Sherwin-Williams Proposed Soil Samples for Horizontal Delineation

1. *Twelve soil samples for horizontal delineation have been proposed for collection along the northern perimeter of the fence line, these locations are depicted on Figure 6. However, it is required that only six soil samples be collected; using the proposed locations (beginning with the proposed sample location near BSSB0038) samples should be collected on an alternating basis (collecting samples from ever other proposed sample point) and ending with the proposed sample location north of BSSB0034. In addition, the sample collection points should be moved (shifted) approximately 5 feet from the fence line. This is based on the fact that previously collected data (i.e., S-1 and S-2) both indicated that exceedances near the fence-line were previously present. All samples should be analyzed for TAL metals.*

Response: Six locations will be used for horizontal delineation, as shown on Figure 6. These locations have been adjusted in response to the comment. Note that all samples are within the fenceline of the Burn Site as no access has been granted by the property owner north of the Burn Site, despite numerous attempts by Sherwin-Williams to gain access. Should access be granted in the future and EPA prefers that the sample locations be moved outside of the fenceline, the sample locations will be adjusted accordingly. Sample collection and analysis will be conducted according to the March 21, 2007 XRF Technical Memorandum, except that no additional "step-out" borings will be collected to the north of the Burn Site if XRF results find constituents at concentrations above screening criteria. All borings will be at least eight feet deep.

Proposed Soil Samples for Vertical Delineation Comments

1. *EPA has reviewed the Sherwin-Williams Company proposal to return to the four locations depicted in Figure 6 and collect further vertical delineation samples and offers the following comments:*

   a) *BSSB-0010, EPA concurs with the proposed sample location. In addition to TAL metals analysis, sample(s) collected should be analyzed for SVOCs and VOCs.*

   b) *BSSB-0015, EPA concurs with the proposed sample location. In addition to TAL metals analysis, sample(s) collected should be analyzed for SVOCs and VOCs.*

   c) *WSSB-0019, EPA concurs with the proposed sample location; TAL metals analysis is approved for this sample point.*

   d) *BSSB-0024, EPA has reviewed this proposed sample location and it is believed that sample location WSSB-0024 was the intended sample location to be recommended, based on the fact that the data cited in the text was for the WSB soil sample. Therefore, EPA suggests that further vertical delineation samples be collected from WSSB-0024 and not BSSB-0024. Samples should be analyzed for TAL metals, SVOCs, and VOCs.*

Response: Sherwin-Williams will perform additional vertical delineation at the locations specified by the USEPA Region II New Jersey Remediation Branch. The comment is correct that the additional vertical delineation samples should have been specified at WSSB-0024 and not BSSB-0024. The additional vertical delineation samples will be collected from WSSB-0024.

Initial sample collection will begin at the following intervals:

BSSB-0010: 5.5' – 6.0'
BSSB-0015: 11.5' – 12.0'
WSSB-0019: 3.5' – 4.0'
WSSB-0024: 8.5' – 9.0'

The protocol for sample collection, field screening and selection for analysis presented in the March 21, 2007 XRF Technical Memorandum will be followed, with the following additions:

- The borings at locations BSSB-0010 and WSSB-0019 will extend at least eight feet below the ground surface.

- Samples from locations BSSB-0010, BSSB-0015 and WSSB-0024 will be field screened with a PID as well as the XRF unit.

- If the field team notes evidence of potential organic constituents, such as PID readings significantly greater than background, staining, or organic odors, in the deepest sampling interval (as determined by the XRF results) from locations BSSB-0010, BSSB-0015 or WSSB-0024, samples will be obtained from one or

more additional vertical intervals until the evidence of potential organic constituents is no longer observed.

- All samples selected for analysis from locations BSSB-0010, BSSB-0015 and WSSB-0024 will be analyzed for VOCs, SVOCs and TAL metals. Samples selected for analysis from WSSB-0019 will be analyzed for TAL metals only.

2. *EPA also requires that the following soil sample locations be further vertically delineated: BSSB0001, BSSB0011, BSSB0014, BSSB0030, BSSB0040, BSSB0041, BSSB0042, SB-127, and SB-548. All samples, except BSSB0030, must be screened to a depth of 8 ft. In addition samples collected at BSSB0030 should be analyzed for TAL metals only; whereas, all other locations must be analyzed for: TAL metals, SVOCs, and VOCs.*

Response: Sherwin-Williams will collect the additional vertical delineation samples at the specified locations. Additionally, in response to comments by the New Jersey Department of Environmental Protection (NJDEP), Sherwin-Williams will perform additional vertical delineation at location BSSB-0035 and also BSSB-0022 (as requested by NJDEP).

Based on the depths at which samples were previously collected at the specified locations, screening and sampling will begin at the following intervals:

BSSB-0001, BSSB-0011, BSSB-0030, BSSB-0040, BSSB-0041, and BSSB-0042:	3.5' – 4.0'
BSSB-0014:	5.5' – 6.0'
BSSB-0022:	11.5' – 12.0'
BSSB-0035:	9.5' – 10.0'
SB-127 and SB-548:	0.5' – 1.0' (TAL Metals; SVOCS)
	1.5' – 2.0' (VOCs)

Although deeper samples were historically collected from locations SB-127 and SB-548, the samples were not analyzed for the analytical parameters specified by the EPA Region II New Jersey Remediation Branch. Therefore, these locations will be approached as if they are new sampling locations. Also, it should be noted that samples were collected from locations SB-127 and SB-548 prior to the current Remedial Investigation and before precise GPS coordinates were collected. Every effort will be made to collect the additional samples from the same locations, but the actual locations may vary from the historical locations. In addition to these 2 locations, an additional soil sample location will be placed approximately in the middle between SB-127 and SB-548.

The sample collection and analysis protocol presented in the March 21, 2007 XRF Technical Memorandum will be used with the following additions:

- All borings except for that installed at location BSSB-0030 will extend to a minimum depth of 8 feet deep.

- Samples collected from each location except BSSB-0030 will also be field screened with a PID unit.

- If the field team notes evidence of potential organic constituents, such as PID readings significantly greater than background, staining, or organic odors, in the deepest sampling interval (as determined by the XRF results), samples will be obtained from one or more additional vertical intervals until the evidence of potential organic constituents is no longer observed.

- All samples selected for laboratory analysis from each location except BSSB-0030 will be analyzed for VOCs, SVOCs and TAL metals. Samples selected for laboratory analysis from BSSB-0030 will be analyzed for TAL metals only.

Additional Sample Points

1. *It is required that three soil samples be collected outside the southern/southeastern fence-line. These samples should be located to the east of BSSB0041 and BSSB0042 (both of which were only sampled to the 0-6" interval). Soil samples should be collected approximately 20 ft. east of the following locations: SB-522, BSSB0040, and BSSB0041. These samples should be analyzed for SVOCs, VOCs, and TAL Metals. Soil samples should be collected in accordance with the soil sampling protocol outlined in EPA's comments on the Hilliard's Creek COPC proposal; however, if XRF screening indicates that there are no exceedances below 3 ft., EPA is requesting that a screening sample be collected to the 8.0 ft. interval, with confirmatory samples collected from the interval with the highest concentration, or from the next interval with no exceedances. If any of the three samples contain levels which exceed the soil screening criteria, additional step-out borings are necessary.*

Response: Sherwin-Williams will collect the samples from the locations specified by the EPA. The soil sampling protocol specified in the EPA comments on Hilliard Creek will be used. That is, samples will be collected from the 0' – 0.5' interval and from the 2.0' – 2.5' interval. Also, as per the above comment, samples will be collected for field screening from the 4.5' – 5.0' and 7.5' – 8.0' intervals.

Sample collection, screening and laboratory analysis for the "baseline" scenario, assuming the field screening finds no evidence of either metals or organic constituents, and where field screening indicates that additional sampling is required, will be as follows:

Baseline Sampling and Analysis
All samples will be field screened with a PID and XRF unit.

Samples from the 0' – 0.5' interval will be analyzed for TAL metals, and the samples from the 2.0' – 2.5' interval will be analyzed for TAL metals, VOCs and SVOCs.

A sample will be collected from either the 4.5' – 5.0' or 7.5' – 8.0' interval, whichever exhibits the highest XRF results, for laboratory analysis for VOCs, SVOCs and TAL metals.

Field Changes Based on XRF and PID Results
If the XRF results from the 7.5' – 8.0' boring are above screening criteria, or there is evidence of organic constituents (significantly elevated PID readings, staining, heavy odors), additional samples will be collected and screened until the XRF results achieve the screening criteria and there is no evidence of organic constituents.

If XRF results for a sample are greater than screening criteria, a "step-out" boring will be installed approximately 25 feet beyond EPA's newly proposed sample location boring. The protocol for sample collection, screening and laboratory analysis presented for the baseline sampling will be used.

2. *Previously collected soil samples along the western interior of the Burn site (i.e., SB-3, SB-49, SB-108, and SB-116) all exhibited exceedances for lead. Elevated lead concentrations were found in both surface and subsurface (at depths up to 8.5 ft.) samples. Although it has been stated that the western extent of soil contamination will be characterized by the Railroad Site investigation, it is required that 5 samples be collected from the outside of the U.S. Ave. Burn site, along the fence-line. The spacing should span from the northern end of the site to the southern end.*

Response: Borings will be installed along the western fence line of the Burn Site, at its boundary with U.S. Avenue. The borings will be a minimum of eight feet deep, consistent with EPA's requirements for other locations. Sample collection and analysis will be conducted as per the March 21, 2007 XRF Technical Memorandum. Samples selected for laboratory analysis will be analyzed for TAL metals only.

GROUNDWATER

1. *Although EPA agrees that additional deep monitoring wells should be installed at the U.S. Avenue Burn site, it is difficult at this time to evaluate and comment on the proposed characterization approach. In addition to not providing data/figures that identify the local and/or regional groundwater flow direction, the submitted information did not include groundwater monitoring well logs/construction specifications (e.g., screened zone, well specifications, etc.), a geologic/hydrogeologic cross-section evaluation, and/or tables that provide water level elevations, depth to water, top of casing, etc. Additional groundwater information, similar to that submitted to EPA in the Response to EPA Letter Dated August 7, 2006 - Sherwin-Williams Gibbsboro Sites, Route 561 Dump Site, dated November 30, 2006; should be prepared and provided to the EPA for the U.S. Avenue Burn site.*

Response: This information will be provided under separate cover to the EPA upon review and resolution of the ground water comments recently received concerning the Dump Site.

NJDEP COMMENTS

Deficiency:

1. *Sherwin-Williams failed to provide a detailed schedule of the activities, in accordance with N.J.A.C. 7:26E-4.2(b)1 within the document.*

Corrective Action:
A schedule in accordance with N.J.A.C. 7:26E-4.2(b)1 is to be submitted with a revised document.

Response: Sherwin-Williams will provide both EPA and NJDEP a schedule of activities when approval of the proposed scope of work is provided.

Deficiency:

1. *Sherwin-Williams has failed to properly provide the appropriate findings/ recommendations section pursuant to N.J.A.C. 7:26E-4.8(b)4. More specifically, on page 3 of the June 19, 2006 letter, Sherwin-Williams incorrectly states that "Soil adjacent to Honey Run did not contain COPC's greater than screening criteria". However, according to the data provided, soil sample HRSB0004 contained arsenic up to 68 mg/kg, Barium up to 971 mg/kg, lead up to 646 mg/kg and zinc up to 1630 mg/kg. HRSB0001 and HRSB0002 and WSSB0012 also contained elevated concentrations of site COPCs.*

Corrective Action:
Sherwin-Williams is to revise this section of the document so that it indicates there are COPC's greater than the screening criteria noted in soil samples obtained adjacent to the Honey Run.

Response: The comment is correct; soil adjacent to the northwestern portion of Honey Run, as it travels through the interior of the Burn Site, does contain elevated concentrations of site COPCs, at levels greater than screening criteria.

Deficiency:

1. *Sherwin-Williams has failed to propose sampling that would delineate contaminants in all media at the site, in accordance with N.J.A.C. 7:26E-4.1(a)1. More specifically, Sherwin-Williams has failed to propose horizontal delineation sampling Northwest of sample location WSSB0020, Northeast of sample location WSSB0021, and around BSSB0015. In addition, Sherwin-Williams failed to propose additional vertical delineation samples at sample locations WSSB0024, BSSB0035, and BSSB0022.*

Corrective Action:
Additional horizontal and vertical delineation is to be proposed within the revised work plan for the sample locations referred to in the above deficiency.

Response: Additional horizontal delineation is proposed northwest of WSSB-0020 and northeast of WSSB-0021, among other locations, in response to comments by the EPA

Region II New Jersey Remediation Branch. Additional vertical delineation is proposed at WSSB-0024 also in response to EPA Region II New Jersey Remediation Branch comments. Sherwin-Williams is proposing to also perform additional vertical delineation at BSSB-0022 and BSSB-0035 in response to the NJDEP comments.

No additional horizontal delineation around BSSB-0015 is proposed. BSSB-0015 is located in the interior of the Burn Site; horizontal delineation will be accomplished through other existing interior sampling locations and exterior locations.

Sherwin-Williams presumes that the above response adequately addresses both agency's comments, however, if you have any questions or additional comments regarding any of the information presented, please let me know and we can arrange to discuss at your convenience - (216) 566-1794 or mlcapichioni@sherwin.com.

Sincerely,

Mary Lou Capichioni

Mary Lou Capichioni
Director, Remediation Services

Enclosure

cc: J. Gerulis, w/o encl.
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M. Pensak, USEPA-Region 2, w/ encl. (2 copies)
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Ms. Mary Lou Capichioni
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Re: *Sherwin-Williams Gibbsboro Sites*
Response to USEPA Comments (September 24, 2007)
Evaluation of Strategic Sampling Results - U.S. Avenue Burn Site and Associated Reaches of Honey Run and White Sands Branch (June 19, 2006)
AOC Index Number: No. II CERCLA-02-99-2035

Dear Ms. Capichioni:

The Environmental Protection Agency (EPA) has completed its review of the *Response to USEPA Comments*, dated September 24, 2007, of the June 19, 2006 *Evaluation of Strategic Sampling Results - U.S. Avenue Burn Site and Associated Reaches of Honey Run and White Sands Branch* submitted by the Sherwin-Williams Company (SWC) pursuant to Administrative Order on Consent (AOC) Index No. II CERCLA-02-99-2035 and offers the following comments.

1. General Comment #1 (SWC Response), page 2 - Please verify that the additional VOC field screening measures and any confirmatory analysis will be performed on samples collected at WST-2 and WST-3; not WST-1 and WST-2 as stated in this response.

2. Page 3 - Please confirm the sampling depths for the proposed soil samples being collected along White Sands Branch transects. On Page 3 it is stated that soil samples will be collected from the following intervals: 0' - 0.5', 1.5' - 2.0', and 3.5' - 4.0'; however, on Page 4 it is stated that soil samples will be obtained from the 0" - 6" and 24" - 30" depth intervals. The second interval being proposed is in question. If the sampling is to be performed in accordance with the Hilliard Creek sampling protocol (i.e., that was specified in EPA Comment Letter dated: May 3, 2006), then the second interval for soil sample collection is 2.0' - 2.5'.

   In addition, it is stated on Page 4 that the Hilliard Creek (sampling) Protocol would be used for sediment as well; however, the following intervals are proposed: 0" - 6" and 18" - 24". Please note, the approved Hilliard Creek sampling protocol (i.e., that was specified in EPA Comment Letter dated: May 3, 2006) specifies that sediment is to be

collected from the following intervals: 0' - 0.5' and 2.5' - 3.0'.

3. Page 4 - Please correct the following sentence, "...original November 2002 Work Plan" to reflect that it is the, "approved November 2003 Work Plan".

4. Page 5 - Sediment Sampling (Honey Run) Response - Please confirm that the soil samples that are to be collected at depth will be analyzed for both TAL Metals and SVOCs.

5. Page 6 - Although HRSB-0007 was previously sampled at only the 0" - 6" interval, in order to maintain consistency with the soil sampling intervals for the newly proposed locations, please begin sampling at the 2.0' - 2.5' interval and not 1.5' - 2.0' interval.

6. Page 7 - Please correct the following statement, "..., despite numerous attempts by both Sherwin-Williams and EPA", to reflect that to date, attempts were made soley by Sherwin-Williams.

7. Page 8, (last paragraph) - The NJDEP proposed soil sample location BSSB-0035 is cited; however, NJDEP soil sample BSSB-0022 should be cited here as well (it is cited on Page 9 and later on Page 12).

8. Page 10 - The statement, "a step-out boring will be installed approximately 25 feet beyond the original boring", should be changed to "a step-out boring will be installed approximately 25 feet beyond EPA's newly proposed location".

9. Additional soil sample - Based on further review of the data, both the historic and the samples collected in 2005, EPA is requesting that an additional soil sample be placed approximately in the middle of samples SB-127 and SB-548.

If you have any questions on this matter, you may contact Mr. Ray Klimcsak, at (212) 637-3916, or if you have any legal concerns, Mr. Carl Howard, Esq., at (212) 637-3216.

Sincerely yours,

Carole Petersen, Chief
New Jersey Remediation Branch

Clarification of Proposed Sampling Locations -
U.S. Avenue Burn Site
and Associated Reaches of Honey Run and White Sands Branch

Burn Site

- Old locations – SB-127, SB-548 and new middle location - begin at 0-6" and then go every 2' in depth. XRF analysis must go to at least 8' in depth. VOC, SVOC, metals analysis.
- Interior Vertical Delineation -
  - BSSB - 10, 15, 1, 11, 14, **22**, 30, **35**, 40, 41, 42, (bold are DEP samples)
  - all samples except for 22, 30, 35 - must be screened to 8' (11 starting beyond 8') - VOC, SVOC, metals
  - 22, 30 and 35 - just metals, and no minimum depth
  - for all locations above, begin 2' below historic sample depth and 2' depths thereafter

Honey Run

- all samples - SVOC, metals, cyanide
- 2 new transects HRT-5 and 6
- Vertical delineation
  - HRSB 001 (start at 3-3.5')
  - HRSB 004 (start at 3-3.5')
  - HRSB 007 (start at 2-2.5')
  - HRSB 0011 (start at 4.5-5')
  - each of 4 borings above must go to at least 8' depth - can use XRF protocol

White Sand Branch

Locations where clarification needed

1. In general, if there was a previous sample collected at a boring location, vertical delineation will begin 2' below the previously sampled depth. If we are starting a new boring with no previous sampling, start at 0-6" and 2' depths thereafter. All locations - XRF protocol will be used.
2. WST-8 (WSB001) - 001 - delineate vertically beginning at 2-2.5' then every 2' in depth. Complete step-outs at 20 feet from 001 (south direction only) and vertically delineate beginning at 0-6" and every 2' in depth thereafter.

3. WST-5 (WSB0020) - 3 step-outs (per DEP request/comment) horizontal and vertical delineation at WSB0020 and all step-outs. WSB0020 start delineation at 3-3.5' depth, and every 2 feet thereafter. Step-out depths = starting at 0-6" then 2-2.5" etc.
    1. North - 25' out
    2. West - 25' out
    3. Northeast - 25' out
4. WST-5 (WSB0022) - vertically delineate starting at 3-3.5. Only 1 step-out required, 20' southeast of 022. Begin sampling at 0-6" and every 2' thereafter.
5. WSB0021 - vertical delineation beginning 3-3.5' depth. No step-outs required.
6. WSB0024 - vertically delineate starting at 8.5-9'. Use XRF to determine if additional vertical delineation is required. No step-outs required.

Locations where no clarification needed

1. 4 new transects WST 2, 3, 6, 7
    - sediment -standard protocol using XRF - 10' apart starting at 0-6", then 2.5-3'
    - soil - top of bank, 20' step-out and then 50' (unless it overlaps with old locations), using XRF protocol - depth depends on results from XRF protocol
    - WST 1, 2 and 3 - VOC, SVOC, metals
    - all other samples are metals only
2. Vertical Delineation Sampling
    - Sediments WSDD- 7, 11, 13, 17 and 29
    - Soil - 1, 2, **13, 16, 17 19**, 20, 21, 22, 24 (non-bold are discussed above)
    - 13 - start at 3-3.5'
    - 16 - start at 3-3.5'
    - 17 - start at 3-3.5
    - 19 - start at 3-3.5
    - for 13, 16, 17, 19 - use XRF protocol - no minimum depth

Note - when sampling a surface soil sample, no VOC will be collected at the standard 18-24". The first VOC sample will be collected from the 2-2.5 sample depth.

NOTE: SD-25 not plotted on this map; not listed in database

NOTES:

1. The following soil samples were collected along White Sand Branch transect locations within the Burn Site:
   Transect WST-1 - Samples WSB00012 to 0014 and 0024
   WST-4 - Samples WSB00015 to 0016
   WST-5 - Samples WSB00020 to 0022
   WST-6 - Samples WSB00001 to 0003
   The transect lines are not shown on this figure.

   The field IDs for the soil samples collected along White Sand Branch are not consecutive due to field error. There is a gap in the sequence and location ID WSB00023 was not used during this investigation.

   The following soil samples were collected along Honey Run transect locations within the Burn Site:
   Transect HRT-1 - Samples HRSB0001 to 0003
   HRT-2 - Samples HRSB0004 to 0006
   HRT-3 - Samples HRSB0007 to 0010
   HRT-4 - Samples HRSB0011 to 0014
   The transect lines are not shown on this figure.

   The field IDs for the strategic soil samples collected within the Burn Site are not consecutive due to field error. There is a gap in the sequence and location ID SBSB0036 was not used during this investigation.

2. The following sediment samples were collected in the Burn Site:
   WSEC0027 to 0014 and 0017 were collected from White Sand Branch transects WST-1, 4, 5, and 6. The transect lines are not shown on this figure.
   WSEC0028 and 0029 where collected as culvert samples.
   HRSC0001 to 0007 were collected from Honey Run transects HRT-1, 2, 3, and 4.
   The transect lines are not shown on this figure.
   WSEC0001 to 0006 were collected from the Dump Site (not shown on this figure).
   WSEC0015, 0016, and 0018 to 0020 were collected from the Vacant Lot (not shown on this figure).
   WSEC0021 to 0025 were collected as culvert samples from the Dump Site (not shown on this figure).
   WSEC0026 to 0027 were collected as culvert samples from the Vacant Lot (not shown on this figure).

3. The following surface water samples were collected in the Burn Site:
   WSEW0007 to 0009 were collected from White Sand Branch transects WST-1, 5, 6, 8 and culvert. The transect lines are not shown on this figure.
   WSEW0026 to 0028 were collected from White Sand Branch transects on the Vacant Lot (not shown on this figure).
   WSEW0029 to 0012 were collected from White Sand Branch transects on the Dump Site (not shown on this figure).
   HRSW0001 to 0004 were collected from Honey Run transects HRT-1, 2, 3, and 4.
   The transect lines are not shown on this figure.
   HRSW0005 was collected from Honey Run upstream of the Burn Site near historic sample point SD-24.

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SHERWIN WILLIAMS

REPORT DATE: JANUARY 2008	PROJECT MANAGER: S. JONES	CLIENT NAME: The Sherwin-Williams Company	DRAWING TITLE: BURN SITE PROPOSED SAMPLE LOCATION MAP UPDATED WITH EPA AND DEP COMMENTS
DRAWING 26427_B6_EPA_Comment_012508 PATH: L:\SHERWIN\GIS\Apr\0107_BS_EPA_Comments	CHECKED BY: A. FISCHER		
REVISION No. 0	CONTRACT No. / DELIVERY ORDER NO.	PROJECT NAME: Sherwin-Williams Gibbsboro Remedial Investigation	
WORK ORDER No. 20076.022.077.0005	DRAWN/MODIFIED BY: J. LYNES / DATE CREATED: 09/24/2007		FIGURE: 6 / SCALE: 1"= 40' / DATE: 01/28/2008