From:	Ferreira, Steve
To:	Hamill, Nancy
Cc:	Ferreira, Gina; Schick, Kevin
Subject:	RE: Hatco Corp. Site, Fords: NJDEP comments on "Remedial Action Progress Report for Southeast Leg Pond Area, Phase 1 Sample Results and Recommendations, July 31, 2020"
Date:	Thursday, August 20, 2020 1:20:00 PM

Thanks, Nancy!

From: Hamill, Nancy <Nancy.Hamill@dep.nj.gov>
Sent: Tuesday, August 18, 2020 2:50 PM
To: Ferreira, Steve <Ferreira.Steve@epa.gov>
Cc: Ferreira, Gina <Ferreira.Gina@epa.gov>; Schick, Kevin <Kevin.Schick@dep.nj.gov>
Subject: Hatco Corp. Site, Fords: NJDEP comments on "Remedial Action Progress Report for Southeast Leg Pond Area, Phase 1 Sample Results and Recommendations, July 31, 2020"

Hello Steve,

The *Remedial Action Progress Report for Southeast Leg Pond Area, Phase 1 Sample Results and Recommendation* was prepared by Weston Solutions, Inc., for USEPA Region 2. I've reviewed the document in accordance with N.J.A.C. 7:26E and other NJDEP guidance documents, and I offer the following comments for your consideration:

1. (p. 1-1) *1.0 Introduction* and (p. 3-1) *3.0 Phase 1 Sample Results Evaluation* - the Introduction states that the objective of Phase 1 sampling is to identify contaminants associated with the stormwater sewer release. The report does not mention this objective again nor clearly state whether the Phase 1 objective was met. Do the potential "new" contaminants in the SEL pond equate to contaminants from the sewer release? Or since the stormwater sewer line ran through an area with consolidated and capped contaminated material from Hatco's SEL Pond remediation project, are the "new" contaminants in fact from the pond material that had been removed? Additionally, the Introduction states that LNAPL had been excavated from the pond and disposed offsite with PCB and BEHP-contaminated soil. What was the source of the LNAPL in the pond discovered in 2018 ? Is it possible that LNAPL was placed in the capped area, or incompletely removed from the pond originally, or is LNAPL unequivocally attributed to the stormwater discharge? Please explain.

2. (p. 3-1) *3.1 Comparison with Clean Fill Data* and Table 4 *Clean Fill Summary Data* - Please describe the uncertainties/limitations of the clean fill summary data related to the elevated method detection limits (MDLs), as described in Weston's March 13, 2020, response to EPA's and NJDEP's comments. For example, perhaps a particular contaminant is not "new" but was present below an elevated MDL. Please revise Table 4 to include the MDLs.

3. (p. 3-4) *3.2.3 Sediment Sample Results* - the text lacked discussion of the most salient finding in the sediment data, i.e., 18 mg/kg Aroclor 1248 was detected at the SEL-PA-SED 04 location, well in excess of the site-specific remediation goal of 1.0 mg/kg (NJDEP/BEERA assumes that this is the same as location SEL-PA-Bottom-04 on Figure 1). Aroclor 1248 also slightly exceeds the remediation goal at the adjacent soil location SEL-PA-SBWe. This document must propose to complete horizontal and vertical delineation at this location, required pursuant to N.J.A.C.7:26E-4.1 and 4.8.

4. (p. 4-1) *4.0 Phase 2 Sampling Recommendations* - Weston proposes to collect soil and

sediment samples at 15-foot intervals along the apparent pathway from the original release to the pond and around the perimeter of the pond at the approximate water line. "New" contaminants on p. 3-1 (i.e. those not present in original clean fill or those detected at 10-times or more than original concentrations), plus hexachlorobenzene, n-nitrosodimethylamine, and arsenic will be analyzed. Nine (9) inorganics that exceed the ecological screening criteria (ESC) are proposed to be excluded from analyses because they were present at low levels in the original clean fill. Surface water is excluded in Phase 2.
The sample locations proposed on Figure 1 indicate only soil locations for Phase 2 - please explain, as this conflicts with text (pp. 3-4 and 4-1) that sediment samples will be collected. Moreover, Weston's March 13, 2020, response to EPA's and NJDEP's comments state that if one or more pond bottom sediment samples collected during Phase I indicate contamination, then Phase 2 sampling will include sediment sampling. NJDEP/BEERA recommends that the SEL Pond be fully characterized and delineated, with sediment sample collection using transects or a gridded approach; two (2) depth intervals are recommended at each location. Surface water should be co-located at a subset of locations because many criteria are promulgated standards and Phase 1 exceedences are noted. Please revise Figure 1 to incorporate the sediment and surface water sample locations as well as the required delineation samples as per comment 3.
Regarding analyses, it is NJDEP/BEERA's opinion that the trigger for analyses should be exceedences of ESC and the NJSWQS, not the designation of "new" contaminants. It is also NJDEP/BEERA's professional judgement that VOA, pesticide, and herbicide analyses can be omitted. Full PAHs, 6 phthalates, 9 Aroclor PCBs, TAL metals, and EPH should be analyzed.
Please contact me at nancy.hamill@dep.nj.gov if you have any questions or need additional information.
Thank you.

Nancy E. Hamill

Research Scientist

Bureau of Environmental Evaluation and Risk Assessment

Mailcode: 401-05W

P.O. Box 420

Trenton, NJ 08625

Phone: 609-633-1353

Fax: 609-292-0848

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