



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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November 20, 2003

Allen Roos  
Project Manager  
U.S. Army Corps of Engineers  
New York District - CENAN-PP  
26 Federal Plaza  
New York, NY 10278-0090

Re: W.R. Grace/Wayne Interim Storage Site - Draft Final Post Remedial Action Report  
(September 2003)

Dear Mr. Roos:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document, and the response to comments prepared by Environmental Chemical Corporation on behalf of the U.S. Army Corps of Engineers (USACE). This Post Remedial Action Report does not address the actions conducted by the USACE during summer, 2003. We understand these actions will be the subject of a separate report. Overall EPA's comments of May 8, 2003 were satisfactorily addressed in the Draft Final, with one exception. The changes made to text on pages 4-29 and 4-30 and the accompanying Table 4-19 in response to Comment 2, 7, and 9 need some additional clarification, as noted below.

1. Page 4-29, Section 4.1.7.2 Surface Water Monitoring: This section needs to be better organized and the discussion clearer. The text should be revised to reflect the information in Table 4-19.
  - a. The first sentence states Results of the 2000 and 2002 surface water sampling events indicated no measured parameters exceeded applicable criterion including radionuclides and metals stated in the ROD and NPDES permit. This is inconsistent with Table 4-19 which shows thallium exceedances in 2000 and 2001, iron exceedance in 2000, and manganese exceedance in 1999.
  - b. The last sentence in the first paragraph should be clarified to indicate Figures 4-18 through 4-23 display results only for radionuclides in surface water samples.
  - c. The second paragraph of this section states that the arsenic concentrations (0.58 to 1.0 ug/L) in the 1999 sampling events in downstream surface water locations exceeded the applicable state and Federal surface water regulatory limits. Table 4-19 shows an arsenic concentration of 3.2 ug/L for the 2000 sampling and a footnoted regulatory limit of 8 ug/L. The arsenic text for surface water sampling needs to be clarified.

2. Page 4-29, Section 4.1.7.4 Groundwater Sampling Results: The fourth paragraph notes that arsenic exceeded the ROD groundwater criterion of 8ug/L. However, the regulatory limit for arsenic listed in Table 4-19 is 0.02 ug/L with an unexplained asterisk. The groundwater text in Section 4.1.7.4 compares the metals results to ROD groundwater criteria. The regulatory limits listed in Table 4-19 reference 40CFR141.
3. Table 4-19, Environmental Monitoring Analytical Results Summary: In comparing the results summary to the regulatory limit column, all the metals exceed the regulatory limits for groundwater samples taken in 1999, 2000 and 2001, and all but arsenic exceeded the regulatory limits for surface water samples taken in 1999, 2000 and 2001. These observations and the report text need to be reconciled.
  - a. In addition, if in some instances the ROD criterion is identical to the NPDES criterion, both should be referenced in the table.
  - b. It would be helpful to have a footnote clarifying why no groundwater samples were collected in 2002.

Please feel free to contact me at 212 637-3450 if you have any questions.

Sincerely,



Angela Carpenter  
Project Manager

cc: D. Gaffigan, NJDEP  
J. Eng, DEPP-RIAB