



DEPARTMENT OF THE ARMY
NEW YORK DISTRICT, CORPS OF ENGINEERS
JACOB K. JAVITS FEDERAL BUILDING
NEW YORK, N.Y. 10278-0090
25 March 2009

REPLY TO
ATTENTION OF

Programs and Project Management Division

Mr. Robert Morse
US Environmental Protection Agency, Region 2
290 Broadway
New York, NY 10007-1866

Dear Mr. Morse:

The last sampling event at the Wayne Interim Storage Site (WISS) in Wayne, New Jersey, occurred in March 2006 and the results of this event are documented in the *DRAFT Long Term Groundwater Monitoring Report* that you received in August 2006. The United States Environmental Protection Agency, Region 2 (EPA) conducted a five-year review of the WISS that is documented in the September 2008 *Five-Year Review Report, W.R. Grace and Co., Inc./Wayne Interim Storage Site (WISS)*. Based on the findings of these two documents, the USACE believes it is appropriate to abandon the 21 existing monitoring wells currently on site.

Groundwater monitoring has demonstrated that all groundwater criteria in the WISS ROD have been met. Over the course of the 5 year monitoring period a few results did exceed ROD and other criteria as discussed below.

Arsenic was detected in WISS-1B at a concentration of 10 ug/l which is in excess of the ROD criterion (8ug/l) but does not exceed the Environmental Protection Agency (EPA) maximum contaminant level (MCL) of 10 ug/L. WISS-1B is a confined aquifer well located upgradient of all former disposal areas and is considered representative of background conditions.

One of the Contaminants of Concern (COC) for the site, chromium, was detected above the ROD criteria in 1 monitoring well during the May 2006 sampling event. The result of 182 ug/L was found in a well that is in the confined aquifer and is located upgradient of all former disposal areas. The source of this elevated reading is attributed to chromium leaching into the well water column from the stainless steel well casing and screen. Previously an onsite stainless steel well demonstrated similar elevated chromium and was replaced by a PVC well. The PVC cased well demonstrated true groundwater chromium much less than the ROD criteria. A detailed discussion of the up gradient incidence is included in the groundwater monitoring reports.

At the time of the ROD signing, a cleanup criteria for Uranium in groundwater was not established. Uranium results were analyzed however, to adjust the Gross Alpha results received from the lab analysis. An MCL for Uranium in groundwater has since been developed so although it is not expressed in the ROD, Uranium is compared to this value for screening purposes. Over the 5 years of monitoring, 2 wells demonstrated elevated Uranium levels. These are shallow low yield wells screened in the highly compacted backfill. As discussed in previous reports, on two separate occasions, additional sampling events were conducted to investigate the reasoning behind the elevated U levels. The results of the most recent of this supplementary event are discussed in a technical memorandum included in Appendix C to the August 2006 report. The previously elevated Uranium results are attributed to the naturally occurring Uranium leaching from backfill materials. The latest sampling efforts have demonstrated that uranium levels in these two, and all other wells, are below the uranium MCL.

The requirements set forth in the Record of Decision for the Wayne site have been met. The EPA Five-Year Review concluded that the selected remedy is functioning as intended by the decision documents and the implemented remedy protects human health and the environment in the short-term. The Five-Year Review Report also states that the groundwater monitoring program requirements, as established in the ROD, have been met. Therefore, upon your approval, the USACE recommends abandoning the 21 monitoring wells currently on site.

Your attention to this matter is greatly appreciated. Please feel free to contact me at 917-790-8333 with any comments or concerns. You are also welcome to contact my Project Engineer, Ann Ewy, at 816-389-3863.

Sincerely,



Allen D. Roos
Project Manager

cc Donna Gaffigan, NJDEP