

RESPONSE TO NJDEPE COMMENTS (JUNE 1992) TO THE
RI REPORT FOR NWSE (MAY, 1992)

General Comments

1. Sample designations and numbers have been checked and clarified.
2. As requested, the revised RI Report includes detection limits for results labelled "U", undetected.
3. The occurrence of acetone as a laboratory contaminant has been discussed at great length with EPA. In general, it is the opinion of Weston analytics that the presence of acetone did not "mask" detection of other chemicals or effect quantification limits of the other compounds. Please see response comments to EPA for a complete discussion. Acetone was eliminated from the field decontamination procedures in the SI sampling in 1992. Collection of additional select groundwater samples has been discussed to rule out acetone as a contaminant of concern.
4. It is our intention to point out that the results of the inorganic analysis of soils and ground water need to be evaluated further to determine whether or not they signify a "release" of contaminants from these sites. The need for background soil sample analysis has been discussed at the TRC meetings and is included in Section 5 of the RI Report recommendations. The groundwater samples represent a more difficult issue in that there does not seem to be general agreement on what interpretation should be given samples collected differently e.g. filtered vs. unfiltered, low turbidity etc. Regional ground water data, from developed production wells typically much deeper than the NWSE monitoring wells cannot be directly compared to the RI data. The recommendations in Section 5 of the RI also include recommendations for confirmation sampling.
5. The soils sampling locations for the RI Sampling (Phase III in the legend) have been added to the figures in Section 4. These were originally not included to avoid cluttering the figures. The 1986 sampling points will not be shown in Section 4 for that reason.
6. The test pit logs are included in Appendix A. Test pit locations were shown in Section 3. The locations have been added to the Section 4 figures in the final report.
7. The text has been checked for consistency in units.
8. New Jersey groundwater quality criteria (Class II) has been added to the first round groundwater tables in Section 4 adjacent to the MCL's.

Specific Comments

2. We recently checked with the Driller, B.L. Myers. A combination of Ricci brand No. 1 and No. 2 "Well Gravel" were used for the RI wells. A specification sheet is attached. The text will also be corrected.
3. MW02-5 will be added to Figure 3-2.
4. NJDEPE standards have been included in the revised groundwater sampling results tables in Section 4.
5. As noted above, there was no intention to "dismiss" the issue of metals in groundwater. The discussion only attempted to point out that the interpretation of these data is not straightforward.
9. Commented noted. The recently promulgated DEPE cleanup guidelines for soils (March, 1993) has been added to the discussion.
10. "These hits" referred to in the text clearly refer to the isolated arsenic and TPH not in the previous sentence, not to metals results generally. Again it is our opinion that the significance of the metals result remains to be determined.
11. The elevated cadmium levels (referenced to MCL's) will be noted in the text.
12. The elevated lead levels (referenced to MCL's) will be noted in the text.
13. The solvents found in MW04-5 require further investigation. This is included in the recommendations in Section 5, however we feel that the general statement is accurate. There is no indication of major releases from this landfill.
14. Correction made.
15. The text in section 4 has been revised to note instances of elevated (referenced to MCL's) metals. In general, the occurrence of metals in ground water above action levels has been noted in section 4 in the revised text. As stated above, the three rounds of ground water samples show certain metals present in the samples. Calling all inorganic constituents "contaminants" is a judgement. For example iron and aluminum are surely natural to some degree. When the ratio of these elements to say chromium is the same between sampling rounds, then there is a question in our mind about whether chromium is a "contaminant".
16. See comment response 15.
17. See comment response 15.
18. See comment response 15. Paragraph deleted as requested.

19. As discussed above we have attempted in revising this report to remove any overly editorial comments. However, we also feel professionally obligated to make some comment on the significance of the data. Even referring to the constituents found in the analysis as "contaminants" is a judgement and not a fact.

20. The data tables only list those metals detected in at least one sample. Cadmium was not detected at this site in the second and third round analysis. To clarify, a footnote explanation has been added to all of the tables of 2nd and 3rd round results in Section 4.

21. Arsenic and cadmium will be included. See comment response 15.

22. Section 5 of the revised RI includes recommendations for additional sampling at Site 26 to address the TCE in groundwater.

24. The statement refers only to those parameters listed in Table 5-1. We think that the original text was clear enough on this, however further clarification has been added to the revised text.

25. Table 5-2 will be revised where incomplete.

26. NJDEPE residential (unrestricted use) clean up goals will be added to the table. It should be emphasized that these standards are included to provide perspective to the reader. ARARS will be established in the FS.

27. The number of metals discussed in section 5-4 was not intended to be exhaustive. Clarification was added to the first bullet in this section. Also, zinc was dropped from the discussion to simplify the discussion and reduce the number of graphs. Zinc was used as an indicator and not a contaminant of concern. Iron data already serves this purpose.

28. The mean concentrations were merely intended to provide a sense of relative abundance between the elements discussed; e.g, iron is far more abundant than the other metals and lead is the least abundant.

29. Because it was not considered very useful by the reviewers, Table 5-6 was deleted from the revised text.